



# CORE STRATEGY PARTIAL REVIEW DEVELOPMENT PLAN DOCUMENT - SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT

Interim Report to accompany Regulation 18 Consultation

JULY 2019

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## VERSION CONTROL

Version	Date	Author	Checker	Approver	Changes
1	July 2019	JE & PC	ST	DH	First draft
2	July 2019	JE & PC	ST	DH	Second draft following Council's first review
3	July 2019	JE & PC	ST	DH	Final version

This report dated **29 July 2019** has been prepared for City of Bradford Metropolitan District Council (the "Client") in accordance with the terms and conditions of appointment dated 10 April 2019 (the "Appointment") between the Client and **Arcadis Consulting (UK) Limited** ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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## Abbreviations

Abbreviation	In full
AA	Appropriate Assessment
AAP	Area Action Plan
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BHS	Biological Heritage Site
CO <sub>2</sub>	Carbon Dioxide
cSAC	Candidate Special Area of Conservation
CSPR	Core Strategy Partial Review
DEFRA	Department for Environment Food and Rural Affairs
DCLG	Department of Communities and Local Government
dpa	Dwellings per annum
DPD	Development Plan Document
dph	Dwellings per hectare
EA	Environment Agency
EC	European Council
ELNA	Economic Land Need Assessment
ELSA	Economic Land Supply Assessment
FZ	Flood Zone
GHG	Greenhouse Gases
GP	General Practitioner
HRA	Habitats Regulations Assessment
IMD	Index of Multiple Deprivation
LDP	Local Development Plan
LDS	Local Development Scheme
LPA	Local Planning Authority
LWS	Local Wildlife Site
LSOA	Lower Super Output Area
MHCLG	Ministry of Housing, Communities and Local Government
MW	Megawatts
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NTS	Non-Technical Summary
OAN	Objectively Assessed Need
pSPA	Potential Special Protection Area
RIGS	Regionally Important Geological/Geomorphological Site
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SANGs	Suitable Alternative Natural Greenspaces
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SNCV	Site of Nature Conservation Value
SoS	Secretary of State
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SuDS	Sustainable (urban) Drainage System

## Non-Technical Summary

### The Core Strategy Partial Review

City of Bradford Metropolitan District Council (the Council) is in the process of updating their Local Plan. This includes a Core Strategy Partial Review (CSPR) Development Plan Document (DPD), as well as a Site Allocations DPD. In April 2019, Arcadis Consulting UK Ltd (Arcadis) were commissioned to provide Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) services to assist with the Council's Plan-making.

Several documents combined currently form the statutory development plan for Bradford District (the District), including the Core Strategy DPD adopted on 18 July 2017, which sets out broad aims and objectives for sustainable development in Bradford, the Bradford City Centre Area Action Plan (AAP) adopted on 12 December 2017, which guides the regeneration of Bradford City Centre up to 2030, and the Shipley and Canal Road Corridor AAP adopted on 12 December 2017, which guides the regeneration of the Shipley and Canal Road Corridor up to 2030. The Bradford Waste Management DPD was adopted on 17 October 2017 and sets out the Council's approach for sustainable waste management. This includes identifying land suitable for waste management facilities and providing a policy framework to determine plan applications for waste development. The Allocations DPD will also form part of the statutory development plan for Bradford should it be adopted.

The Core Strategy DPD, which was successfully adopted on 18 July 2017, is an essential part of the Local Plan for Bradford. It sets out the strategic housing, employment, transport, retail, leisure and environmental policy requirements for the District and provides context for the scale, location and distribution of development, including site allocations (but does not allocate specific sites itself).

Following updates to national planning policy, particularly that which is related to calculating housing needs and Green Belt protection, the Council determined that a partial review of the recently adopted Core Strategy was necessary. The proposed Core Strategy Partial Review (CSPR) would also be an opportunity to consider local policy changes including the adoption of a new economic strategy.

### Sustainability Appraisal and Strategic Environmental Assessment

The Council, as the local planning authority (LPA), is legally required by Section 19 of the Planning and Compulsory Purchase Act 2004<sup>1</sup> to carry out a Sustainability Appraisal (SA) of their Plans. The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>2</sup> dictate that after adopting a plan the LPA must make the SA Report available.

SA is a mechanism for assessing the extent to which an emerging plan promotes sustainable development by applying a holistic assessment of the likely effects of the plan on social, economic and environmental objectives.

SEA is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup> (the SEA Regulations), which transposes Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment<sup>4</sup> (SEA Directive) into UK law. As per the SEA Directive, SEA is a systematic process designed to:

*'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development (Annex 1).'*

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<sup>1</sup> Available online at: [https://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga\\_20040005\\_en.pdf](https://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga_20040005_en.pdf) [Accessed 24.06.19]

<sup>2</sup> Available online at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Accessed 24.06.19]

<sup>3</sup> Available online at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Accessed 24.06.19]

<sup>4</sup> Available online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Accessed 24.06.19]

This is the non-technical summary of an Interim SA Report intended to accompany the Regulation 18 consultation on the CSPR.

National Planning Policy Guidance (NPPG)<sup>5</sup> states that SA should incorporate the requirements of the SEA Regulations. This is because of the similarities between SA and SEA and the opportunities an integrated approach provides for avoiding repetition. This SA of the CSPR therefore integrates the requirements of SEA (and is from here on referred to in this report simply as the SA).

SA is an iterative process and, over several stages and potentially multiple SA Reports, will help the Council with achieving sustainable development in their plan-making. This is by predicting and evaluating the likely sustainability impacts (including environmental, social and economic impacts) of options being considered for the CSPR (including individual impacts and cumulative impacts) so the Council can make informed choices over what policies and development to pursue in their Plan. The SA also provides recommendations to the LPA which, if adopted, would help to avoid or mitigate any likely adverse sustainability impacts of options or alternatively would help to enhance the likely positive sustainability impacts. It is expected that the SA will make a meaningful contribution towards ensuring that the CSPR delivers sustainable development in Bradford alongside other evidence documents being prepared by the Council.

## The Scoping Stage

The first stage of the SA process was the scoping stage, within which the context, relevant objectives, baseline data and scope of the SA was established and consulted on with stakeholders. The scoping stage concluded in April 2019.

It is an essential requirement, as well as a necessary component of preparing a robust and accurate appraisal, to understand the policy context in which the SA is being prepared. A comprehensive review of plans and programmes at a national, regional, sub-regional/city region and local level was therefore undertaken during the scoping stage to identify implications for the CSPR and the SA.

Baseline information refers to the existing economic, social and environmental characteristics of an area that may be affected by the CSPR. It informs the development of a set of SA Objectives, which in turn informs the SA and plan preparation. Baseline information detailing a range of social, economic and environmental data was obtained from a number of sources during the scoping stage. This data was used to identify key sustainability issues in Bradford to determine key objectives for the CSPR.

Using the baseline data as well as the identified key issues and opportunities for the Plan area, an SA Framework made up of a number of SA objectives was prepared. The SA objectives are up-to-date, relevant to the Bradford context and allow a consistent approach to predicting and evaluating the economic, environmental and social effects of the CSPR policies. Every policy in the CCSR, and reasonable alternatives, will be assessed against these SA objectives to determine their likely sustainability impacts. The SA Framework consists of the following SA objectives:

- To ensure the prudent and efficient use of energy including the promotion of renewable and low carbon energy;
- To minimise waste and increase the amount of waste which is re-used, recycled and recovered;
- To reduce and manage the impacts of climate change on the District and vulnerability to its effects;
- To safeguard and improve air quality;
- To safeguard and improve water resources;
- To conserve and enhance geodiversity and biodiversity, including the internationally, nationally and locally valued wildlife species and habitats;

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<sup>5</sup> Available online at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed 24.06.19]

- To maintain, protect and enhance the character of the area’s natural and man-made landscapes and townscapes;
- To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources;
- To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts and reduces congestion, pollution and carbon emissions by increasing transport choice and reducing the need to travel by lorry/private car;
- To make efficient use of existing land and buildings;
- To conserve and, where appropriate, enhance the significance of heritage assets and their setting;
- To improve the quality and range of services available within communities and connections to wider social, environmental and economic networks;
- To promote social cohesion, encourage participation and improve the quality of life in deprived neighbourhoods;
- To create good cultural, leisure and recreation activities available to all;
- To improve safety and security for people and property;
- To provide the conditions and services to improve physical and mental health and well-being and reduce inequality to access to health and social care;
- To promote education and training opportunities which build the skills and capacity of the population;
- To increase the number of high-quality job opportunities suited to the needs of the local workforce; and
- To support investment and enterprise that respects the needs of a local area.

## Developing Alternatives

For all policies being reviewed and amended, the Council could potentially include a range of different alternative policy wordings or approaches. The SEA Directive requires the Council to identify ‘reasonable alternatives’ for all policies and proposals, where feasible. The sustainability impacts of all reasonable alternatives should then be identified and evaluated. From these reasonable alternatives, the Council can then identify their ‘preferred options’ for policies and proposals in the CSPR. It is important that the selection of each preferred option is justified in light of the alternatives that were available.

A key purpose of this Interim SA Report is to predict and evaluate the likely sustainability impacts of all reasonable alternatives identified by the Council, as well as preferred options, and to document these findings in order that the Council can factor this into their decision-making over what the policies and proposals in the CSPR will look like. Recommendations are made alongside the assessments for consideration by the Council in order to help maximise positive sustainability impacts and to avoid or mitigate negative impacts of the CSPR. This Interim SA Report also seeks to ‘tell the story’ of how reasonable alternatives were identified by the Council as well as how the Council selected and defined their ‘preferred options’ from these alternatives

The Regulation 18 version of the CSPR presents a range of strategic, sub-area and development management policies that conform with the CSPR Objectives and would help to achieve the Council’s vision for the District. For each policy under review, the Council present their preferred option followed by the reasonable alternative dealt with. As the CSPR is only a partial review of the now adopted Core Strategy, some policies are not going to be under review and are not going to fundamentally change. They are therefore the same policies that were found to be sound and were successfully adopted in 2017. These policies are also known to conform with the Plan’s objectives. It is therefore considered that any alternative to these policies would not be ‘reasonable’ and so no reasonable alternatives to these policies are identified.

Overall, the Council identified a range of reasonable alternatives for the housing need, spatial distribution, core policies and various development management policies.

## Assessments

The assessments of options are essentially a prediction of their likely effects on each SA Objective (i.e. would the option contribute towards achieving the SA Objective?) and an evaluation of the magnitude, reversibility, permanence, probability, duration and frequency of these effects. There is an assessment of each individual option as well as an assessment of the likely cumulative impacts of all options in-combination. The assessments of the policies and proposals in the CSPR, including the preferred options and reasonable alternatives, identified a range of sustainability impacts as per Table NTS-1.

*NTS-1: Summary of assessment results*

Strategic Core Policies – Effects summary
<p>With regards to the preferred options, the assessments in this SA identified largely positive impacts and frequently significantly positive impacts for Strategic Core Policies. It is expected that these policies would help to ensure that future development in Bradford maximises opportunities for using PDL and limits Green Belt release, particularly when compared with the approach proposed in the Adopted Core Strategy or reasonable alternatives identified during the CSPR. The Strategic Core Policies would also help to ensure that development in Bradford generally contributes towards creating a greener and healthier District, with significant emphasis placed on urban regeneration and efforts to improve air quality, enhance biodiversity, reduce the District’s carbon footprint and enhance the walking, cycling and public transport offering. It is expected that Strategic Core policies would help to ensure that new employment land and economic development contributes towards significant urban regeneration across the District, including where it is needed most, with the accessibility and quality of employment opportunities likely to improve over the Plan period for all people in Bradford but particularly in key growth sectors such as manufacturing, digital, financial and professional services.</p> <p>The assessment of the Strategic Core policies recorded some potential negative impacts that could arise, predominantly due to potential impacts associated with new development. For example, where policies encourage significant levels of new development there is a risk that, whilst the local socio-economic conditions would benefit significantly, local environmental constraints or assets could be impacted by the construction and occupation of new homes. Assessments in SA typically adopt a precautionary approach wherein the worst-case scenario is focused on. It is expected that other policies in the CSPR designed to help manage development make these worst-case scenarios highly unlikely.</p>
Sub-Area Policies – Effects summary
<p>The sub-area policies were recorded as being highly likely to lead to significant social and economic gains to each sub-area, with residential and employment development likely to be of a scale and type appropriate to each area and situated in the most sustainable locations. The various criteria designed to guide development in each sub-area, as well as the focus of new investment, would be highly likely to help realise significant regeneration in each sub area with opportunities for using PDL maximised. The detailed consideration of what kinds of development would be appropriate in which locations would help to ensure that the character and setting of the distinctive and historic settlements in each sub-area would be preserved and enhanced.</p> <p>The assessments of sub-area policies identified some potentially negative impacts when considered with a precautionary approach, primarily due to the risks of new development. Whilst the CSPR and sub-area policies seek to maximise the use of PDL, in some instances there could be significant release of Green Belt land to accommodate residential development (although significantly less Green Belt release and at less settlements than is currently proposed in the adopted Core Strategy, and significantly less than in some of the reasonable alternatives). Such development could potentially pose a risk to the character or biodiversity value of sites in the Green Belt, although it is important to bear in mind that these impacts would be heavily mitigated by other policies in the CSPR.</p>
Economic Policies – Effects summary
<p>The economic policies in the CSPR are predicted to contribute towards major economic regeneration throughout the District with significant growth in jobs (1,600 jobs per annum), a change to the nature of employment, significant growth in key markets that have been identified by the Council and major improvements to the skills learning opportunities for local people. Start-up rates would be likely to increase with entrepreneurship, which is already particularly high in Bradford compared with other local authorities, strongly supported and encouraged by the Council. These opportunities would deliver major societal benefits such as extensive urban regeneration, reduced deprivation, poverty and inequality, greater employment security and higher job satisfaction. The mental wellbeing of local would benefit hugely from this.</p>

<p>There are naturally some risks associated with major economic growth and development, particularly for the natural environment. For example, new and increased business operations would lead to changes to the consumption of natural resources in the District. Whilst these risks would be avoided or mitigated to some extent by other policies proposed in the CSPR, it is uncertain the extent to which they would entirely be mitigated or avoided and so some negative impacts for the more natural environment objectives cannot be entirely ruled out at this stage.</p>
<p>Transport and Movement Policies – Effects summary</p>
<p>The transport and movement policies are predicted to make a major contribution towards Bradford's steady transition towards a low-emission, more efficient and more sustainable transport system where local people have a reduced need to travel and have more sustainable options travelling when they need to do so. Major improvements to the quality and capacity of bus and rail as well as walking and cycling routes are expected. The more sustainable travel facilitated by the CSPR would have various indirect benefits for several SA Objectives, such as improving air quality, reducing carbon footprints, more cohesive communities, enhanced accessibility of key services and amenities as well as benefits for people's health associated with higher rates of walking and cycling.</p>
<p>Housing Policies – Effects summary</p>
<p>The housing policies set out the overall quantity of new homes and the spatial distribution for delivering this. The policies also pursue significant growth in the local provision of affordable housing and a mix of housing types that can cater to Bradford's diverse and growing needs. Whilst there are likely to be some risks to natural environment objectives associated with the construction and occupation of this development, there is a major focus on brownfield urban regeneration, high-quality design, healthy places and sustainable communities. The delivery of this housing over the Plan period would be expected to alleviate existing issues related to the local housing stock, such as overcrowded homes, whilst reducing local rates of poverty, homelessness and deprivation.</p>
<p>Environment Policies – Effects summary</p>
<p>The CSPR proposes a range of environment policies that would help to ensure that new residential and economic development maximises its positive impacts on the natural environment whilst avoiding and mitigating negative impacts. The Council has recognised the need to achieve a biodiversity net gain and has proposed policies designed to help achieve this, such as a new development that provides new and enhanced GI elements and protects local ecological connectivity. Positive impacts are particularly expected in the brownfield locations, which are the focus of the CSPR, and there are likely to be a variety of indirect benefits of this for air quality, carbon emissions, water quality and character.</p>
<p>Mineral Policies – Effects summary</p>
<p>The mineral policies performed the worst against the SA Framework of all policy themes when viewed from a precautionary standpoint. It is likely that new or increased extraction of minerals or hydrocarbons would deliver significant societal and economic gains to the local area whilst providing new materials necessary for construction or fuel. A local supply of these materials may also be a more sustainable approach than acquiring them from further afield. Whilst the policies set out stringent criteria for proposals for new or expanded extraction, it is not possible to rule out the negative sustainability impacts associated with new or increased extraction sites, particularly those associated with the extraction of fossil fuels. The process of new extraction can pose a significant risk to the environment and character of the local area, particularly if there is an open-cast mine. Whilst these risks and impacts would to some extent be avoided or mitigated by the criteria proposed in the mineral policies as well as the requirements of other policies, they are unlikely to be entirely avoided or mitigated.</p>
<p>Waste Management Policies – Effects summary</p>
<p>Waste management policies are predicted to help enhance the sustainability and efficiency of waste management in Bradford and would be likely to contribute towards the increasing rates of reduce/re-se/recycle in the District. Some potentially negative impacts have been predicted associated with new waste management facilities sites or new HGV movements, such as potential impacts on air quality.</p>
<p>Design Policies – Effects summary</p>
<p>The design policies were assessed as making a positive contribution to the majority of SA Objectives and they would</p>

be highly likely to help ensure that potential negative impacts of development, such as those identified for policies that support new residential development, are avoided or mitigated. In particular, the design policies would be expected to help ensure that new development is of a high-quality, is visually attractive whilst respecting the local area and is accessible to all people.

#### Implementation and Delivery Policies – Effects summary

The implementation and delivery policies were recorded as resulting in mostly uncertain or negligible impacts on SA Objectives. These policies would be expected to help ensure that future development is viable and that the necessary infrastructure is in place and so positive impacts on the housing, economy and employment SA Objectives were considered to be likely as a result of Bradford's development needs being met. However, it was largely not possible to predict impacts on other SA Objectives with certainty.

## Recommendations

Alongside the assessment results, recommendations have been made that would help to avoid or minimise the negative effects, as well as enhance the positive effects. Recommendations have only been made for policies under review.

## Next steps

The Draft CSPR will be consulted on in July - September 2019 along with this SA Report, following which the responses received from stakeholders will be reviewed and considered. The CSPR will then be further refined and updated to form the Publication Version. At the same time, the SA will be updated and refined in line with any changes made to the CSPR. The Publication CSPR and SA Report will then be consulted on once more before being submitted to the Secretary of State for consideration.

# 1 Introduction

## 1.1 Background

The City of Bradford Metropolitan District Council (the Council) is in the process of updating its Local Plan. This includes a Core Strategy Partial Review (CSPR) Development Plan Document (DPD), as well as a Site Allocations DPD. In April 2019, Arcadis Consulting UK Ltd (Arcadis) was commissioned to provide Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) services to assist with the Council's Plan-making.

This document constitutes an Interim SA Report to accompany Regulation 18 Consultation on the CSPR.

### 1.1.1 About the Bradford Local Plan

Several documents combined currently form the statutory development plan for Bradford District (the District). This includes the following documents:

- Core Strategy DPD<sup>6</sup> adopted on 18 July 2017, which sets out broad aims and objectives for sustainable development in Bradford as well as broad policies for guiding development and broad locations for new housing, employment and infrastructure (without allocating specific sites for development);
- Bradford City Centre Area Action Plan<sup>7</sup> (AAP) adopted on 12 December 2017, which guides the regeneration of Bradford City Centre up to 2030;
- Shipley and Canal Road Corridor AAP<sup>8</sup>, adopted on 12 December 2017, which guides the regeneration of the Shipley and Canal Road Corridor up to 2030; and
- Bradford Waste Management DPD<sup>9</sup>, adopted 17 October 2017, which provides a spatial plan and policies for sustainable waste management in Bradford.

### 1.1.2 About the Core Strategy DPD

In February 2007 the Council produced a series of topic papers, setting out the issues and options grouped into key themes:

- Paper 1: Introduction and Background;
- Paper 2: The Spatial Vision and Strategy for Bradford;
- Paper 3: Meeting the Needs for Dwellings in the Districts;
- Paper 4: Economy and Jobs;
- Paper 5: Transport and Accessibility;
- Paper 6: Community Facilities;
- Paper 7: Environment; and
- Paper 8: Waste Management.

The topic papers were made available to the public for comment between February and July 2007. Following consideration of the representations received, and in response to changes to the Yorkshire and Humber Plan (the RSS), the Council felt it necessary to put forward a number of more detailed options to accommodate development. A Further Issues and Options document was, therefore, produced, which focused specifically on key elements of the Core Strategy, namely the spatial vision, strategic objectives and spatial options for

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<sup>6</sup> Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/>

<sup>7</sup> Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/city-centre-action-plan-documents/>

<sup>8</sup> Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/shipley-and-canal-road-corridor-area-action-plan-dpd/>

<sup>9</sup> Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/waste-management-dpd/>

the location of development. This was followed by a Further Engagement Draft in October 2011. Community involvement and engagement took place at each stage to ensure that the Council produced a Core Strategy that met the needs of all its stakeholders and the local community.

The Core Strategy DPD, which was successfully adopted on 18 July 2017, is an essential part of the Local Plan for Bradford. It sets out the strategic housing, employment, transport, retail, leisure and environmental policy requirements for the District and provides context for the scale, location and distribution of development, including site allocations (but does not allocate specific sites itself).

The Core Strategy includes a spatial vision for how different parts of the District will change. It sets out Strategic Core Policies and Sub Area Policies that determine the scale of development required to meet objectively assessed needs, the broad pattern of development to be accommodated and how this growth will be distributed between different areas. It also shapes where new employment, retail development, leisure and recreational facilities, transport infrastructure and supporting other community infrastructure are needed. The Core Strategy also sets out development management related policies spread across the themes of:

- Economy and jobs;
- Transport and movement;
- Housing;
- Environment;
- Minerals;
- Waste;
- Design; and
- Implementation and delivery.

### **1.1.3 Partial Review**

Following updates to national planning policy, particularly that which is related to calculating housing needs and Green Belt protection, the Council determined that a partial review of the recently adopted Core Strategy was necessary. The proposed Core Strategy Partial Review (CSPR) would also be an opportunity to consider local policy changes including the adoption of a new economic strategy.

The intention of the review is to prepare a new DPD that would replace the existing Core Strategy 2017. However, as the review is only partial, not all of the elements in the existing Core Strategy 2017 will change and many of them will be carried through into the new CSPR DPD. Overall, it is expected that the CSPR will review and update the following elements of the existing Core Strategy:

- The Core Strategy Plan Period: National planning policy indicates a Plan should look ahead over a 15-year period. The current Core Strategy only runs until 2030, and so this period is under review;
- Strategic housing policies: These include the housing requirement for the District that the Local Plan should seek to satisfy, as well as the distribution of this development and its phasing. In light of changes to how local planning authorities (LPAs) should calculate housing need, these policies are under review;
- Economic growth: The Council wants to help enable a strong and vibrant economy in the District, and so employment needs, retail and leisure needs and land requirements for this are under review;
- Green Belt: National planning policy places great importance on Green Belt land. One of the aims of the partial review is to re-assess whether there are exceptional circumstances which justify changes to green belt boundaries. The Council intends to ensure all reasonable options for meeting the identified need for development are explored before coming to its conclusion;
- Viability: It is necessary to closely consider the viability of policies to ensure they are realistic and deliverable;
- Development management policies: A limited number of policies related to the themes of Economy; Transport and movement; Housing; Environment; and Implementation and Delivery Policies are expected to be reviewed and updated.

## 1.1.4 About the Site Allocations DPD

In addition to carrying out a partial review of the Core Strategy, the Council are preparing a Site Allocations DPD. This will be an important document that allocates land in Bradford for new development in order to meet the housing and employment needs in the District over the Plan period. The Allocations DPD will deliver the vision and objectives set out in the Core Strategy (and the CSPR when it is adopted). The Allocations DPD will cover all of Bradford except for Bradford City Centre and the Shipley and Canal Road Corridor, each of which are subject to their distinct AAPs. This Interim SA Report is focussed solely on the CSPR. The Site Allocations DPD will be subject to its own distinct SA Reports (also prepared by Arcadis).

## 1.2 Sustainability Appraisal and Strategic Environmental Assessment

### 1.2.1 Sustainability Appraisal

The Council, as the local planning authority (LPA), is legally required to carry out an SA of their Plans by Section 19 of the Planning and Compulsory Purchase Act 2004<sup>10</sup>. The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>11</sup> dictate that after adopting a plan the LPA must make the SA Report available.

SA is a mechanism for assessing the extent to which an emerging plan promotes sustainable development by applying a holistic assessment of the likely effects of the plan on social, economic and environmental objectives.

### 1.2.2 Strategic Environmental Assessment

SEA is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004<sup>12</sup> (the SEA Regulations), which transposes Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment<sup>13</sup> (SEA Directive) into UK law.

As per Annex 1 of the SEA Directive, SEA is a systematic process designed to:

*'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.'*

### 1.2.3 Integrated SA/SEA

National Planning Policy Guidance (NPPG)<sup>14</sup> states that SA should incorporate the requirements of the SEA Regulations. This is because of the similarities between SA and SEA and the opportunities an integrated approach provides for avoiding repetition. This SA of the CSPR therefore integrates the requirements of SEA (and is from here on referred to in this report simply as the SA). The SA process will appropriately culminate in the Final SA Report that also satisfies the requirements of an SEA Environmental Report. As this document is only an Interim SA Report it is not intended, and is not able, to fully satisfy the requirements of an SEA Environmental Report at this stage. In addition to NPPG, this integrated SA/SEA process is in accordance with 'A Practical Guide to the Strategic Environmental Assessment Directive'<sup>15</sup> published by the Office of the Deputy Prime Minister in 2005.

### 1.2.4 SA/SEA and Plan-making

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<sup>10</sup> Available online at: [https://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga\\_20040005\\_en.pdf](https://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga_20040005_en.pdf) [Accessed 24.06.19]

<sup>11</sup> Available online at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Accessed 24.06.19]

<sup>12</sup> Available online at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Accessed 24.06.19]

<sup>13</sup> Available online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Accessed 24.06.19]

<sup>14</sup> Available online at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed 24.06.19]

<sup>15</sup> Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/76577/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/76577/practicalguidesea.pdf) [Accessed 18.07.19]

SA is an iterative process which, over several stages and potentially multiple reports, assists an LPA with achieving sustainable development in their plan-making. This is by predicting and evaluating the likely sustainability impacts (including environmental, social and economic impacts) of options being considered for the Plan (including individually and cumulatively) so the LPA can make informed choices over which options to pursue. The SA also provides recommendations to the LPA which, if adopted, would help to avoid or mitigate potentially negative sustainability impacts to enhance potentially positive impacts. It is expected that the SA will make a meaningful contribution towards ensuring that the CSPR delivers sustainable development in Bradford. However, the Council and the CSPR preparation process is being informed by a diverse range of evidence bases, such as that which is related to the development needs of Bradford or the land available for development, and this will also inform the Council's decision making process over which options to pursue in the CSPR.

A typical iterative relationship between the SA Process and the Plan-making process is presented in Figure 1.1. This Interim SA Report constitutes a key element of Stage B as it provides appraisals and recommendations to help the Council develop and refine their alternatives for the Plan. This document is also an early indication of what the SA Report referred to in Stage C will look like.

Table 1-1 provides an overview of where this SA Report sits in relation to the SA of the CSPR.

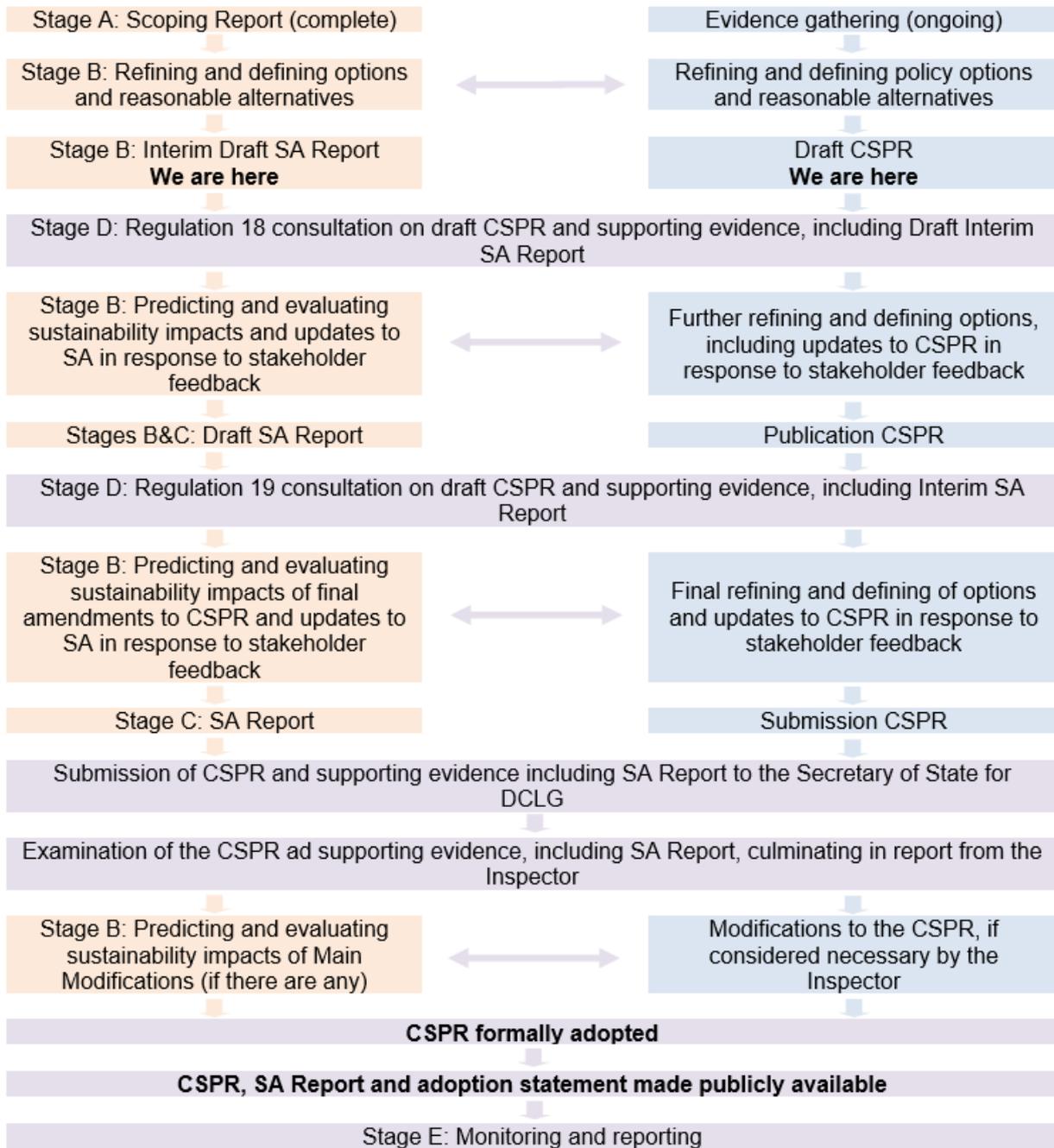


Figure 1.1: Typical iterative process of SA and plan-making

Table 1.1: SA of the Bradford CSPR

Plan Stage	SA & SEA Stage	SA & SEA Requirements	Completed
Evidence Gathering and Issues and Options	Stage A. Setting the context and objectives, establishing the baseline and deciding on the scope	A1: Identify related plans/programmes	SA Scoping Report consulted on January – February 2019 and finalised in April 2019 following responses
		A2 & A3: Identify environmental protection objectives	
		A2 & A3: Baseline data and likely future trends	
		A2 & A3: Identify sustainability issues and opportunities	
		A4: Develop objectives, indicators and targets (SA Framework)	
		Prepare SA Scoping Report	
		A5: Consult on the SA Scoping Report	
Draft CSPR for Regulation 18 consultation	Stage B. Developing, refining and appraising alternatives and assessing effects	B1: Test the CSPR Objectives & Vision against the SA Objectives	Completed in this Interim SA Report, July 2019
		B3 & B4: Assess CSPR options, including their reasonable alternatives	
		B5: Propose mitigation and enhancement measures	
		Prepare Interim SA Report	
Submission version of the CSPR for Regulation 19	Stage C. Preparing SA Report	B3 & B4: Identify changes to CSPR since previous stage and assess significance	Stage to be completed
	Stage D. Consultation on SA Report	B6: Propose monitoring programme	
		Prepare Non-Technical Summary (NTS)	
		C: Update all other elements to the SA Report in light of the changes to the Plan	
		C: Ensure the SA Report is compliant with the SEA Directive in terms of requirements for an Environmental Report	
D: Consult on the SA Report			
Examination	Stages C & D. Update and amend report in light of any Modifications to the CSPR	B3 & B4: Determine the relevance of any Modifications made to the Plan as an outcome of Examination and assess these	Stage to be completed
		Prepare addendum to the SA Report addressing the Main Mods and assess impacts	

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Plan Stage	SA & SEA Stage	SA & SEA Requirements	Completed
Adoption	Stage E. Adoption Statement		<i>Stage to be completed</i>

### **1.3 Habitat Regulations Assessment**

Habitats Regulations Assessment (HRA) is a requirement of Council Directive 92/43/EEC (the Habitats Directive 1992) and Council Directive 2009/147/EC (the Birds Directive), which are transposed into UK law through the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). The Council have commissioned Footprint Ecology to prepare an HRA for the LPR to identify risks caused by the LPR for European sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

HRA screens the Plan to determine if a likely significant effect (LSE) on the conservation status of a European site can be objectively ruled out. If not, the HRA proceeds from the screening to an appropriate assessment of the LSE to establish its likelihood and appropriate measures for avoidance and mitigation.

The Council have commissioned Footprint Ecology to prepare the HRA of the CSPR. At its current stage, the HRA has not been able to rule out an LSE on European sites caused by policies BD1, AD1, WD1 & PN1, HO1, HO2, HO3 and HO12 based on the need to undertake more detailed assessment of the impacts of overall housing numbers within the CSPR. This is due to the residential development potentially adding to recreation pressure on the South Pennine Moors SPA/SAC. There could potentially also be impacts through the pathways of water quality, water resources, air quality and urbanisation impacts. It is expected that the HRA will now proceed to an appropriate assessment to be prepared in advance of Regulation 19 consultation on the CSPR.

## 2 Stage A: Scoping Report

### 2.1 Context, Objectives, Baseline and Scope

This chapter will provide detail on the statutory requirements, best practice and the results for Stage A, which is typically referred to as the Scoping Stage. The Scoping stage involves completing Tasks A1, A2, A3, A4 and A5 and presenting the results in a distinct, accessible and concise Scoping Report that is consulted on (although a Scoping Report is not a statutory requirement, it is accepted as best-practice).

Stage A of the SA of the CSPR has been carried out and documented in the SA Scoping Report that was consulted on between January and February 2019 and finalised in April 2019. The below boxes summarise the requirements, best practice and results of Stage A for the SA of the CSPR.

The spatial scope of the SA is the District of Bradford. Transboundary effects will also be accounted for where feasible.

Options and proposals being considered for inclusion in the CSPR will be appraised for their likely short-term, medium-term and long-term effects. Effects are also noted for their reversibility or their permanence. Whilst the majority of the identified effects will be likely to only last for as long as the CSPR is in place for (it is expected that it will be updated or replaced by a new Core Strategy, or similar planning document, in the future), many effects may reside until long after the CSPR is replaced. The temporal scope is therefore unlimited.

The technical scope of the SA is limited to the requirements of SA and SEA integrated into one process. All options will be appraised against all SA Objectives in the SA Framework (see below) accounts for all topics listed in Annex 1(f) of the SEA Directive as well as other elements of social and economic sustainability considered to be pertinent to Bradford. The topic of 'Material assets' is broad and can be considered to account for both natural assets such as minerals, woodland and agricultural land, and built assets such as infrastructure, buildings and manufactured goods. Most SA Objectives can therefore be seen as having some degree of relevance to material assets.

#### 2.1.1 Relevant Policies, Plans & Programmes

The first task of Stage A involves satisfying the requirement of the SEA Directive to clearly describe related plans and programmes that influence the production of the Local Plan. It is noted that there is a raft of international and national policy that will have an indirect influence on the CSPR. For the purposes of the Scoping Report it is considered that these have been translated into more immediately relevant strategic national and local documents. Relevant policies, plans and programmes (PPPs) were identified at International, European, National, Regional and Local scales, the full list of which is presented in Appendix A. It will be necessary for the CSPR, as well as its accompanying SA process, to conform with the legal requirements of these PPPs as well as best practice.

The detailed review of relevant PPPs can be found in Appendix A.

#### 2.1.2 Baseline data and key sustainability issues

The second task of Stage A is comprised of collating baseline information relating to the current social, economic and environmental characteristics relevant to Bradford District. It provides the basis for predicting and monitoring the likely effects of a plan – in this case the CSPR DPD - and identifying key sustainability issues and opportunities of relevance to land use planning. The SA should take into consideration the best available data at a level of detail appropriate to the scale of the Plan but should not seek to gather or prepare primary data.

Annex 1(f) of the SEA Directive sets out a number of topics that must be considered and presented, which are:

- Biodiversity;
- Population;
- Human health;
- Fauna;

- Flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage, including architectural and archaeological heritage;
- Landscape; and
- The interrelationship between these factors.

To allow linkages, trends and patterns within the baseline information to be identified, baseline data gathered during the Scoping stage was broken down into a number of broad topic areas, reflecting those listed above:

- Communities, Population & Housing;
- Health & Inequalities;
- Economy;
- Natural Environment;
- Built Environment;
- Connectivity & Infrastructure; and
- Resources.

The detailed review of relevant baseline information can be found in Appendix B.

The baseline data was analysed to identify the key sustainability issues in the District for each broad topic area. The range of identified issues was highly diverse and is present in full in Appendix B.

### **2.1.3 SA Framework**

Based on the baseline data and key issues and opportunities for the Plan area, an SA Framework was prepared. The SA Framework is comprised of 19 SA Objectives, each of which relates to particular key sustainability issues in the District. It is considered that by seeking to ensure that options considered in the CSPR contribute towards the achievement of these SA Objectives, then the CSPR would deliver development that is not only sustainable but helps to tackle the specific challenges and opportunities relevant to Bradford.

All options, including preferred options and reasonable alternatives, are assessed for the extent to which they contribute towards achieving each SA Objective. Because each SA Objective is directly related to key sustainability issues in Bradford, which are based on the baseline data of the District and take into consideration topics listed in Annex 1(f) of the SEA Directive, this approach enables a consistent, robust and thorough approach to predicting and evaluating the likely sustainability effects of all options and alternatives.

The Council initially prepared the SA Scoping Report in 2018 and consulted on it with stakeholders between 11 January and 22 February 2019. The responses received from the stakeholders, and the changes that were subsequently made to the SA Scoping report as a result of these, are presented in Appendix C. This includes some minor changes that were made to the SA Framework. Following consultation on the Scoping report, the Council commissioned Arcadis to provide SA services to assist with the preparation of the Local Plan documents. The first stage of this was a detailed review of the SA Scoping report. Following this, the final version of the SA Scoping report is presented in Table 2-1.

#### **Task A1: Identifying other relevant policies, plans and programmes and SA objectives**

SEA Directive (Annex 1) states:

*“(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; ... (e) the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme...and the way those objectives and any environmental considerations have been taken into account during its preparation”*

It is therefore an essential requirement, as well as a necessary component of preparing a robust and accurate appraisal, to understand the policy context in which the SA is being prepared.

#### **Tasks A2 and A3: Collecting baseline information and identifying sustainability issues and opportunities**

SEA Directive (Annex 1) states:

*“(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; (c) the environmental characteristics of areas likely to be significantly affected; (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;...”*

Baseline information refers to the existing economic, social and environmental characteristics of an area that may be affected by the CSPR. It informs the development of a set of objectives, based on the data gathered, to inform the SA and plan preparation. Among the important decisions considered during the Scoping stage was with regards to the data, quantity of data and how should it be used in order to carry out SA. The review of plans and programmes (A1) and the gathering of baseline data (A2) facilitates the identification of key sustainability issues and opportunities (A3) in the District.

Baseline information detailing a range of social, economic and environmental data was obtained from a number of sources. Collectively this data was used as the baseline for identifying key sustainability issues and determining objectives for the CSPR.

#### **Task A4: Developing the SA Framework**

Based on the baseline data and key issues and opportunities for the Plan area, an SA Framework should be prepared comprised of Objectives that are fundamentally linked to the baseline data and issues and opportunities. It is important that the SA Objectives that are to be used are up-to-date, relevant for the plan area and can also provide a consistent approach between strategic level policies and site/area specific policies as part of the Plan. The SA Framework enables the Council to consider the impacts and alternatives of plans, programmes and policies.

The SA Framework that emerged from the SA Scoping Report considers the existing sustainability baseline in Bradford and the key sustainability issues in the District. Every proposal in the CSPR, and all reasonable alternatives, will be assessed against every objective of this Framework to identify their likely impacts on sustainability in relation to the likely evolution of the baseline in the absence of the plan. The SA Framework is set out in Table 2-1.

#### **Task A5: Consulting on the scope of SA**

Outcomes of Tasks A1, A2, A3 and A4 should be consulted on with, as a minimum, the three statutory consultees of Natural England, the Environment Agency and Historic England.

Table 2.1: SA Framework

SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
1	To ensure the prudent and efficient use of energy including the promotion of renewable and low carbon energy	Energy consumption in the District Renewable energy generation capacity in the District Renewable energy consumption in the District Energy efficiency levels in new buildings Levels of GHG emissions in the Authority area Proportion of new developments meeting Excellent BREEAM standard or exceeding this Megawatts (MW) of installed renewable and low carbon energy capacity within the District	Climatic Factors; Material Assets
2	To minimise waste and increase the amount of waste which is re-used, recycled and recovered	Use of secondary and recycled aggregates Production of primary aggregates (crushed rock; sand & gravel) and other minerals (clay) Proportion of residential waste sent to landfill Percentage of household waste sent for reuse, recycling or composting Proportion of municipal waste sent to landfill	Water; Soil; Air; Climatic Factors
3	To make efficient use of existing land and buildings	% and number of permissions for all development granted on previously developed land. Number of planning applications permitted on best and most versatile agricultural land Number of developments remediating contaminated land	Population; Human Health; Material Assets
4	To reduce and manage the impacts of climate change on the District and vulnerability to its effects	Number and type of flooding incident Number of residential units granted planning permission contrary to EA objection Number of applications granted contrary to Lead Local Authority advice on surface flooding % of development in zone 3 of the flood plain % of developments with Sustainable Urban Drainage (SUDs) Proportion of new development incorporating green infrastructure elements including green roofs and planting, that is beneficial to surface water flood risk Upland tree canopy in the District	Water; Soil; Air; Climatic Factors
5	To safeguard and improve water resources	Number of applications granted contrary to Environment Agency advice on water quality Proportion of homes meeting national standards for water efficiency and optional standards (where viable) set out in the Local Plan as well as proportion of homes exceeding these standards Ecological and chemical status of surface waters as determined by the EA in line with Water Framework Directive requirements	Biodiversity; Flora; Fauna; Soil; Water; Air; Climatic Factors; Human Health
6	To conserve and enhance geodiversity and biodiversity,	Quantity and proportion of new development within Zones of Influence of North and South Pennine Moors SACs and SPAs	Biodiversity; Flora; Fauna; Soil

SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
	including the internationally, nationally and locally valued wildlife species and habitats	<p>Area designated for nature conservation importance, including Ancient Woodland, lost to development</p> <p>Number of sites identified of local nature conservation importance, and proportion of local sites where positive conservation has been or is being implemented</p> <p>Number of species relevant to the District which have achieved BAP or are otherwise protected</p> <p>Prevalence of protected species in the District over the Plan-period</p> <p>Provision of green infrastructure in new developments</p> <p>Ecological connectivity in Bradford</p>	
7	To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes	<p>Area designated for nature conservation importance</p> <p>Number of sites identified of local nature conservation importance, and proportion of local sites where positive conservation has been or is being implemented</p> <p>Proportion of development built in the countryside</p> <p>Number, or % or area of historic buildings (including Listed Buildings, World Heritage Sites, Scheduled Monuments, locally listed buildings), archaeological sites and areas and their settings (both designated and non-designated) damaged</p> <p>Number and % of Listed Buildings considered to be "at Risk"</p> <p>Quantity of vacant and/or derelict land and properties</p>	Biodiversity; Flora; Fauna; Landscape; Cultural Heritage
8	To conserve and, where appropriate, enhance the significance of heritage assets and their setting	<p>Number and % of Conservation Areas with an up to date character appraisal and a published Management Plan</p> <p>Number and % of Listed Buildings considered to be "at Risk"</p> <p>Number of buildings of historic or architectural interest brought back into active use</p> <p>Number, or % or area of historic buildings (including Listed Buildings, World Heritage Sites, Scheduled Monuments, locally listed buildings), archaeological sites and areas and their settings (both designated and non-designated) damaged</p> <p>Number and percentage of Listed Buildings in the Saltaire World Heritage Site considered to be "at Risk"</p> <p>Condition of key views to/from Saltaire World Heritage site</p>	Cultural Heritage
9	To safeguard and improve air quality	<p>Population living within Air Quality Management Areas</p> <p>Number of Air Quality Management Areas</p> <p>% of mortality attributable to particulate air pollution</p> <p>Proportion of population living within 400m of a bus stop and within 2km of a Railway Station</p> <p>Uptake of walking, cycling and public transport modes for travelling to work</p>	Air; Human Health
10	To develop and maintain an integrated and efficient transport network which	<p>Proportion of people travelling to work or school by public transport, walking and cycling</p> <p>Proportion of people living within 2km of work or school that use the private car as a mode of transport</p> <p>Traffic volumes</p>	Population; Human Health; Air; Material

SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
	maximises access whilst minimizing detrimental impacts and reduces congestion, pollution and carbon emissions by increasing transport choice and reducing the need to travel by lorry/private car	Proportion of population living within 400m of a bus stop and within 2km of a Railway Station Traffic volumes Accessibility of new housing, employment and retail schemes by public transport. Access to bus and rail services Proportion of new development meeting accessibility standards Number of implemented Travels Plan	Assets
11	To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	Levels of population growth and population structural changes Percentage of homes with one room too few in relation to household size Percentage of households classed as severely overcrowded with at least two rooms two few Number of households on the household register Number of people accepted as homeless (annually) House prices and housing affordability (house price to income ratios) Net housing completions Net affordable housing completions Housing Mix (new housing types and tenure) Housing land supply Net additional Pitches for Gypsies and Travellers Number and location of vacant or empty properties Number of new dwellings meeting accessible housing standards Number of new dwellings meeting nationally described space standards	Population; Material Assets
12	To improve the quality and range of services available within communities and connections to wider social, environmental and economic networks	Proportion of the District population who are overweight or obese Life expectancy at birth Healthy Life Expectancy Number of new or improved healthcare facilities delivered annually through development Number of new sports pitches or other leisure facilities delivered annually through development Income levels (Gross Weekly Pay) Employment rate Unemployment rate	Population; Human Health; Material Assets
13	To promote social cohesion, encourage participation and improve the quality of life in	Proportion of the District population who are overweight or obese Accessibility of new housing, employment and retail schemes by public transport Number of new or improved healthcare facilities delivered annually through development	Population; Human Health; Material Assets

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SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
	deprived neighbourhoods	Number of new sports pitches or other leisure facilities delivered annually through development Levels of deprivation across the district Provision of green infrastructure, open space and recreational facilities within new development Proportion of new development not within or adjacent to existing communities	
14	To create good cultural, leisure and recreation activities available to all	More visitors to the District and greater spend Proportion of the District population undertaking regular physical activity Proportion of the District population visiting cultural facilities/participating in cultural activities Number of new sports pitches or other leisure facilities delivered annually through development Provision of green infrastructure, open space and recreational facilities within new development	Population; Human Health; Material Assets
15	To improve safety and security for people and property	Crime rates per 1,000 head of population Proportion of local people who feel safe in their community Number of road traffic accident (KSI)	Population; Human Health; Material Assets
16	To provide the conditions and services to improve physical and mental health and well-being and reduce inequality to access to health and social care	Proportion of the District population who are overweight or obese Life expectancy at birth Healthy Life Expectancy Number of new or improved healthcare facilities delivered annually through development Access to services and facilities Fraction of mortality attributable to particulate air pollution. % of people with limiting long term illness	Population; Human Health; Material Assets
17	To promote education and training opportunities which build the skills and capacity of the population	Proportion of working age population with no or lower level qualifications % of working age population with NVQ Level 4 and above % of 16-year olds achieving 5+ GCSEs at grades A* to C (including maths, English and NOVQ attainment) Number of new homes more than 1km from a primary school and more than 2km from a secondary school Education infrastructure capacity Level of education infrastructure delivered through development	Population; Human Health; Material Assets
18	To increase the number of high-quality job opportunities suited to the needs of the local workforce	Proportion of working age population with no or lower level qualifications. % of working age population with NVQ Level 4 and above Proportion of working age population employed in each of the Soc 2010 Major Groups Number of jobs created, assessed against employment requirements and targets Number of jobs by employment sector Income level (Gross Weekly Pay)	Population; Human Health; Material Assets

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SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
19	To support investment and enterprise that respects the needs of a local area	Levels of economic growth (Gross Value Added) Employment rate Number of jobs created, assessed against employment requirements and targets Number of jobs by employment sector Vacancy rates in employment locations Number of business start-ups and survivals Location of new business growth and development Increased levels of investment Increased levels of spend Enhanced retail facilities More visitors to the District and greater spend	Population; Human Health; Material Assets

## 3 Stage B: Developing Alternatives and Assessing Effects Rationale

### 3.1 Statutory requirements and best practice for Stage B

During Stage B of SA, options being considered in the CSPR are appraised using the SA Framework in order to predict and evaluate their likely sustainability impacts. Appraisal results are shared and discussed with the Council, along with recommendations for avoiding, mitigating or enhancing effects, through an iterative process in order to ensure that environmental and sustainability considerations are factored into their decision-making process from the onset.

The statutory requirements for Stage B, which includes Tasks B1 – B6, are as follows:

#### **Task B1: Testing the plan objectives against the SA Objectives**

The Objectives of the Plan should be tested for their compatibility with, and their likely effects on, each SA Objective and identifying other options or opportunities to refine options.



#### **Task B2: Developing the Options**

Task B2 involves identifying and considering various options that would help to contribute towards the SA Objectives. This can be seen as being the identification and consideration of preferred options, and alternatives to these options, in the Plan. In light of the likely effects of each option, as identified and described through the iterative SA process, the Council is equipped to refine and select options for the Plan so as to achieve sustainable development.



#### **Tasks B3 & B4: Predicting and evaluating the effects of the Plan**

Tasks B3 and B4 of the SA process involve helping to develop the Plan by predicting and evaluating its effects on the economic, environmental and social sustainability of the Plan-area. Government guidance states that the potential effects should to be quantified or a judgment made where this is not possible.

Sustainability effects are predicted, with a focus on their likelihood, scale, duration, timing and whether they are positive or adverse. These predications are then evaluated using professional judgement in order to identify cumulative, synergistic and secondary effects as well as conflicts and limitations of Plan policies.



#### **Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects**

Mitigation involves putting in place measures to prevent, reduce or offset any identified adverse sustainability effects. Mitigation measures may also include recommendations for enhancing positive effects. The first priority should, however, be avoidance of adverse effects. Only when all alternatives that might avoid an adverse effect have been exhausted, should mitigation be sought to reduce the harmful effect.



#### **Task B6: Proposing measures to monitor the significant effects of implementing the Plan**

A monitoring system should be prepared and proposed that, if adopted and followed, would enable the LPA to ensure that the Plan is resulting in the predicted effects and that avoidance, mitigation or compensation measures that were adopted are working as planned. This provides the opportunity to alter measures to make them more effective.

## 3.2 B1: Testing CSPR Objectives against the SA Objectives

Stage B.1 involves testing the compatibility of the vision and objectives of the CSPR with the SA Objectives in order to identify where potential conflicts could arise. Compatibility was determined by assessing the extent to which the CSPR Objective accords with the SA Objective. Each SA Objective has clearly defined indicators. The compatibility check identifies whether the strategic objectives in the CSPR would be likely to make a positive contribution towards achieving the SA Objective or, if by adopting that strategic objective, it may make it more difficult to achieve the SA Objective. This can be a somewhat evaluative and holistic judgement based on experience and best practice and carried out at a strategic and high level.

## 3.3 B2: Developing the Options

Developing options for the CSPR involves the identification and consideration of preferred options and alternatives to these options. In light of the likely effects of each option, as identified and described through the iterative SA process, the Council is equipped to refine and select options for the Plan so as to achieve sustainable development.

### 3.3.1 Reasonable alternatives

A key component of SEA is the consideration of reasonable alternatives.

#### SEA Directive Article 5:

*(1) Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which **the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives** taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.*

#### SEA Directive Annex 1:

*(h) ... **an outline of the reasons for selecting the alternatives dealt with**, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the information., and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the information.*

#### SEA Regulations Article 9:

*1. Member States shall ensure that, when a plan or programme is adopted, the authorities referred to in Article 6(3), the public and any Member State consulted under Article 7 are informed and the following items are made available to those so informed: ...*

*(b) ... **the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with,***

In practice, the requirements from the SEA Directive necessitate the following for the SA of the CSPR:

- The SA should identify the reasonable alternatives for proposals in the CSPR and predict and evaluate their likely environmental and sustainability impacts to the same level of detail as all options being appraised – the idea being that decisions made during the preparation of the CSPR are evidence led and informed by what the most sustainable options are;
- The SA should outline the reasons for which reasonable alternatives were considered to be ‘reasonable’ whilst other options were not; and
- The SA should justify the selection of the preferred approach in light of the alternatives dealt with.

The CSPR proposes a range of strategic, sub-area and development management policies that conform with the CSPR Objectives and would help to achieve the Council’s vision for the District. Arriving at the options

considered for the CSPR has been a lengthy process that also includes the preparation process of the now Adopted Core Strategy.

The first stage in the production of the Adopted Core Strategy 2017 involved the identification of key issues associated with the District and the development of initial options for the Core Strategy. A Further Issues and Options, which focused specifically on the spatial vision, strategic objectives and spatial options for the location of development, was produced and consulted on between January and March 2008.

The Issues and Options documents identified a range of reasonable alternatives for proposals in the Core Strategy. This included options for policies, as per Table 3-1, for which there were several options considered and appraised in the SA at the time and which were appraised in the March 2009 SA Report<sup>16</sup>. The SA of the Adopted Core Strategy also considered reasonable alternatives to the spatial strategy (i.e. the overall approach to the distribution of development in Bradford) as per Table 3-2.

The reasonable alternatives discussed in Table 3-1 and Table 3-2 are not being re-assessed in this SA Report. The CSPR is a partial review so some options explored for the Adopted Core Strategy and its SA are not now being re-opened for discussion as such options are outside the scope of the partial review. **This SA only focusses on reasonable alternatives to aspects of the Core Strategy that are being reviewed.** The intention of Table 3-1 and Table 3-2 is to show that, although this SA does not assess reasonable alternatives to those policies not being changed, the SA of the Adopted Core Strategy did previously assess their reasonable alternatives.

Table 3-1: Policy reasonable alternatives considered during the preparation of the Adopted Core Strategy 2017 and assessed in the accompanying SA Report<sup>17</sup>

Topic	Reasonable alternatives
Housing	
	Options for ensuring that effective use is made of land and buildings
	Options for ensuring that dwellings are provided in the right places to meet local needs
	Options for meeting needs for affordable homes
	Options for achieving the correct balance of new dwellings in terms of type and size
	Options for achieving the correct balance of house building
Economy and jobs	
	Options for the development of housing on employment land
	Options for the sustainability performance of dwellings
	Options for ensuring there is the right amount of land allocated for employment use
	Options for allocating land for employment uses
	Options for protecting existing employment land and building stock
	Options relating to the diversification of the economy
Transport and movement	
	Options contributing to the enhancement of existing accessibility to jobs, services and facilities
	Options for influencing the level of car use and road congestion
	Options for improving road safety
	Options for supporting economic activity and regeneration efforts
	Options for supporting the sustainable movement of freight

<sup>16</sup> Entec, March 2009 SA Report, available online at: <https://www.bradford.gov.uk/Documents/planningStrategy/11%20Sustainability%20appraisal//Sustainability%20appraisal%20-%20issues%20and%20options%20report.pdf>

<sup>17</sup> Entec, March 2009 SA Report, available online at: <https://www.bradford.gov.uk/Documents/planningStrategy/11%20Sustainability%20appraisal//Sustainability%20appraisal%20-%20issues%20and%20options%20report.pdf>

Topic	Reasonable alternatives
Community facilities	
	Options for ensuring new and existing healthcare and education facilities are accessible, well served by public transport and promote social inclusion
	Options for ensuring that all communities have access to a high-quality green space and sport and recreation facilities
	Options for ensuring all sections of the community have access to retail provision
	Options for ensuring all sections of the community have access to local community and cultural facilities
Environment	
	Options for protecting water resources and quality
	Options for protecting air quality
	Options for protecting biodiversity resources
	Options for biodiversity enhancement
	Options for protecting landscape character
	Options for protecting heritage assets
	Options for achieving high standards of design for new development
	Options for addressing sustainable design
	Options for renewable energy sources
	Options for regeneration and flood risk
	Options for aggregates provision

Table 3-2: Reasonable alternatives to the spatial strategy proposed in the 2017 Core Strategy and assessed in the accompanying SA Report<sup>18</sup>

Spatial option	Housing	Employment
SO1: RSS Settlement Hierarchy Options	65% (32,500) of homes in sub-regional city (Bradford/ShIPLEY/Baildon) 30% (15,000) homes in Principal Towns 5% (2,500) homes in Local Service Centres	Employment development would be concentrated in existing employment zones, South and East Bradford and Keighley. Local Service Centres would only provide enough employment to cater for local needs.
SO2: Continuation of the RUDP	50% (25,000) of homes in sub-regional city (Bradford/ShIPLEY/Baildon) 30% (15,000) homes in Principal Towns 20% (10,000) homes in Local Service Centres	Employment development would be concentrated in existing employment zones, South and East Bradford and the Airedale Corridor. Local Service Centres would only provide enough employment to cater for local needs.
SO3: Focussed growth-points around the sub-regional city	70% (35,000) of homes in sub-regional city (Bradford/ShIPLEY/Baildon) 20% (10,000) homes in Principal Towns 10% (5,000) homes in Local Service Centres	Employment development would be concentrated in existing employment zones, South Bradford and growth areas around Bradford/ShIPLEY/Lower Baildon and Keighley. Local Service Centres would only provide enough employment to cater for local needs.
SO4: Dispersed Growth Points	65% (32,500) in the sub-regional city (Bradford/ShIPLEY/Baildon) 10% (5,000) homes in Principal Towns 20% (10,000) homes in Local Growth Centres 5% (2,500) in Local Service Centres	Employment development would be concentrated in existing employment zones, South Bradford and growth areas around the Sub Regional City and the Airedale Corridor. Local Service Centres would only provide enough employment to cater for local needs.
Preferred Spatial	68% (28,650) in sub-regional city	72% (97ha) Regional City of Bradford

<sup>18</sup> Available online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/?Folder=11+Sustainability+appraisal> [Accessed 24.06.19]

Option	(Bradford/ShIPLEY/Baildon) 16% (6,700) Principal Towns 8% (3,400) Local Growth Centres 8% (3,350) Local Service Centres	21% (28ha) Airedale Corridor 7% (10ha) Wharfedale Corridor
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The Core Strategy adopted by the Council in 2017 was subject to an SA process. The results of this process are available on the Council's website. The SA at the time appraised all proposals in the adopted Core Strategy, as well as their reasonable alternatives.

### 3.3.2 Options in the CSPR

As the CSPR is only a partial review of the now adopted Core Strategy, some of the now-adopted policies are not going to be under review and are not going to fundamentally change. They are, therefore, the same policies that were found to be sound and were adopted in 2017. These policies are also known to conform with the Plan's objectives. It is therefore considered that any alternative to these policies would not be 'reasonable' and so no reasonable alternatives to these policies are identified.

It is currently expected that Core Strategy policies not under review will be re-adopted by the Council through the CSPR. As they would combine with reviewed policies to form a new Core Strategy DPD, that replaces the Adopted Core Strategy, it is necessary to ensure that they are accompanied by an up to date SA appraisal. The appraisals of policies not under review that were carried out in the SA of the Adopted Core Strategy used a different SA Framework to the one in this SA Report and so new assessments of these policies have been carried out for completeness and to ensure all policies have been appraised in a consistent manner. Whilst the SA frameworks are different, they follow the same themes and therefore the current and previous SA findings align. This is an important aspect of the cumulative effects assessment which requires the combined effects of all policies to be appraised and therefore requires a comparable appraisal approach to achieve this.

For all policies in the Core Strategy under review that will fundamentally change as a result of this, the Council has identified a range of reasonable alternatives. This includes reasonable alternatives for the housing need, spatial distribution, core policies and various development management policies.

The Council is intending to reset the plan period from 2020 to 2037, which allows for a 17-year plan length and a forward view on strategic policies of 15 years from the date of anticipated adoption in 2022. By increasing the plan end date from 2035 to 2037 this allows for slippage and uncertainties in the plan period and aims to ensure that the plan looks ahead over a minimum 15- year period from adoption. A number of alternatives to the preferred option for the plan period have been considered and discounted by the Council.

Table 3-3 presents the options for policies in the CSPR, including policies that are not under review and so do not have reasonable alternatives as well as the policies that are under review and so do have reasonable alternatives. All of the policy options listed in Table 3-3, as well as their reasonable alternatives, have been assessed to the same level of detail to identify their likely sustainability impacts. Chapter 4 provides an overview of the sustainability performance of all options and alternatives, as well as an overview of why the preferred options were selected in light of the reasonable alternatives dealt with.

Table 3-3: Preferred options for policies in the CSPR and their reasonable alternatives

Ref.	Policy name / preferred option	Under review?	Reasonable alternatives
<b>Presumption in Favour of Sustainable Development</b>			
P1	Presumption in Favour of Sustainable Development	No	n/a
<b>Strategic Core Policies</b>			
SC1	Overall Approach and Key Spatial Priorities	Yes	SC1RA1
SC2	Climate Change and Resource Use	Yes	SC2RA1; SC2RA2; SC2RA3
SC3	Working together to make Great Places	No	n/a
SC4	Hierarchy of Settlements	No	n/a
SC5	Location of Development	Yes	SC5RA1; SC5RA2; SC5RA3
SC6	Green Infrastructure	Yes	SC6RA1; SC6RA2; SC6RA3

Ref.	Policy name / preferred option	Under review?	Reasonable alternatives
SC7	Green Belt	Yes	SC7RA1; SC7RA2; SC7RA3
SC8	Protecting the South Pennine Moors and their Zone of Influence	No	n/a
SC9	Making Great Places	No	n/a
SC10	Creating Health Places	New Policy	SC10RA1; SC10RA2; SC10RA3
<b>Sub Area Policies</b>			
BD1	City of Bradford including Shipley and Lower Baildon	Yes	BD1RA1
BD2	Investment priorities for the City of Bradford including Shipley and Lower Baildon	Yes	No
AD1	Airedale	Yes	AD1RA1
AD2	Investment Priorities for Airedale	No	n/a
WD1	Wharfedale	Yes	WD1RA1
WD2	Investment Priorities for Wharfedale	No	n/a
PN1	South Pennine Towns and Villages	Yes	PN1RA1
PN2	Investment Priorities for the Pennine Towns and Villages Sub Area	No	n/a
<b>Planning for Prosperity: Economy</b>			
EC1	Creating a successful and competitive Bradford District economy within the Leeds City Region	Yes	EC1RA1
EC2	Employment Land, Jobs & Skills Requirements	Yes	EC2 has been updated to conform with the latest evidence base on the objectively identified employment needs and land availability in Bradford. The Council considered that any alternative to this (i.e. and alternative that does not conform with the best available evidence or does not seek to satisfy Bradford's needs whilst conforming with land availability), would not be reasonable.
EC3	Employment Land Requirement	Yes	EC3RA1; EC3RA2
EC4	Sustainable Economic Growth	No	n/a
EC5	City, Town, District and Local Centres	No	n/a
<b>Planning for Prosperity: Transport</b>			
TR1	Travel Reduction and Modal Shift	Yes	TR1RA1
TR2	Parking Policy	Yes	TR2RA1
TR3	Integrating Sustainable Transport and Development	Yes	TR3RA1
TR4	Transport and Tourism	No	n/a
TR5	Strategic Transport Delivery	Yes	No reasonable alternatives available.
TR6	Freight Priorities	Yes	TR6RA1
TR7	Transport Investment and Management	No	n/a
TR8	Aircraft Safety	No	n/a
<b>Planning for People: Housing</b>			
HO1	District Housing Requirement	Yes	HO1RA1; HO1RA2
HO2	Strategic Sources of Supply	Yes	n/a
HO3	Distribution of Housing Development	Yes	HO3RA1; HO3RA2; HO3RA3; HO3RA4; HO3RA5; HO3RA6
HO4	Managing Housing Delivery	Yes	HO4RA1; HO4RA2; HO4RA3
HO5	Density of Housing Schemes	Yes	HO5RA1
HO6	Maximising use of Previously Developed Land	Yes	The policy has been updated in line with best available evidence and strategic priorities for the Plan. It is considered that any alternative to this would not be reasonable.
HO7	Housing Site Allocation Principles	No	n/a
HO8	Housing Mix	Yes	HO8RA1; HO8RA2
HO9	Housing Quality	Yes	HO9RA1; HO9RA2
HO10	Overcrowding and Vacant Homes	No	n/a

Ref.	Policy name / preferred option	Under review?	Reasonable alternatives
HO11	Affordable Housing	Yes	HO11RA1; HO11RA2
HO12	Provision of Sites for Gypsies, Travellers and Travelling Showpeople	Yes	HO12RA1; HO12RA2
<b>Planning for Place: Environment</b>			
EN1	Open Space, Sports and Recreational	No	n/a
EN2a	Biodiversity and Geodiversity	Yes	ENa2RA1; ENa2RA2; ENa2RA3
EN2b	Biodiversity and Development	Yes	ENb2RA1; ENb2RA2
EN3	Historic Environment	No	n/a
EN4	Landscape	No	n/a
EN5	Trees and woodlands	No	n/a
EN6	Energy	No	n/a
EN7	Flood Risk	Yes	No - The changes made to the policy have been in order to make the policy conform with the new Sequential Flood Risk Assessment in Bradford as well as to be strengthened in relation to surface water runoff, SuDS and Natural Flood Management. The Council considered that an alternative to this strengthening of the policy would not be reasonable.
EN8	Environmental Protection Policy	Yes	No - The policy has been strengthened in response to feedback from stakeholder consultees. The Council considers that an alternative to this would not be reasonable.
<b>Planning for Place: Minerals</b>			
EN9	New Minerals Extraction Sites	No	n/a
EN10	Sandstone Supply	No	n/a
EN11	Sand, Gravel, Fireclay and Coal Supply	No	n/a
EN12	Minerals Safeguarding	No	n/a
<b>Planning for Place: Waste Management</b>			
WM1	Waste Management	No	n/a
WM2	Waste Management	No	n/a
<b>Planning for Place: Design</b>			
DS1	Achieving Good Design	No	n/a
DS2	Working with the Landscape	No	n/a
DS3	Urban Character	No	n/a
DS4	Streets and Movement	No	n/a
DS5	Safe and Inclusive Places	No	n/a
<b>Planning for Place: Implementation and Delivery</b>			
ID1	Development Plan Documents and Authority Monitoring Report	Yes	No reasonable alternatives available.
ID2	Viability	Yes	No reasonable alternatives available. The amendments to ID2 are to ensure the policy is in line with national policy and any alternative this (i.e. to not conform with national policy) would not be reasonable.
ID3	Developer Contributions	No	n/a
ID4	Working with Partners	No	n/a
ID5	Facilitating Delivery	No	n/a
ID6	Simplification of Planning Guidance to Encourage Sustainable Development	No	n/a
ID7	Community Involvement	No	n/a
ID8	Regeneration Funding and Delivery	No	n/a

### 3.4 B3 & B4: Predicting and Evaluating Effects

Tasks B3 and B4 of the SA process involve helping to develop the Plan by predicting and evaluating the effects of options (individually and cumulatively) on the economic, environmental and social sustainability of the Plan-area. Government guidance states that the potential effects should be quantified, or a judgment made, where this is not possible.

The prediction and evaluation of the effects of options in the CSPR (including reasonable alternatives, as listed in Table 3-3) relies heavily on the SA Framework – every option is appraised for its likely impacts on

every SA Objective. The SA Framework provides indicators for each SA Objective that help to guide the decision-making over whether options would make a negative or positive contribution towards each SA Objective.

In line with requirements of the SEA Directive (particularly Annex 2(II) and Annex 1(f), the following characteristics of effects are predicted and evaluated:

- Probability;
- Duration, including short-, medium- and long-term effects;
- Frequency
- Reversibility;
- Cumulative and synergistic nature;
- Transboundary nature;
- Secondary nature;
- Permanent or temporary nature; and
- Positive or negative nature.

A key principle of sustainability assessments is a precautionary approach wherein at times of uncertainty or where evidence is lacking the worst-case scenario is assumed. The prediction and evaluation of significant effects in SA therefore typically assumes the worst-case scenario. However, it is accepted that such scenarios arising are in reality unlikely, particularly as the comprehensive array of policies proposed in the CSPR would help to avoid or mitigate negative impacts.

Table 3-4 provides the rationale behind the approach taken towards predicting and evaluating the above characteristics.

Table 3-4: Rationale for appraisals of options

Characteristic	Rationale
Format	<p>The appraisals are presented in tables (see Table D-1). Where appropriate, options and policies are grouped together in the same assessment table. The rationale for this is as follows:</p> <p>Policies are grouped together in the Local Plan;</p> <p>Policies under the same theme in the Plan, such as ‘Transport’ policies, are likely to result in similar effects on a number of indicators. Grouping the appraisals together facilitates less repetition of text, saving space and reducing the need for a paperchase for readers;</p> <p>Grouping appraisals together facilitates a more holistic appreciation of the likely cumulative effects of the Plan and the overall impact of all policies in-combination. Policies in the Plan are not going to be adopted in isolation; and</p> <p>Grouping policies and options together facilitates a comparison of the likely impacts of options vs their reasonable alternatives.</p> <p>The assessment text for SA Objectives 9 and 10, on air quality and transport, and the assessment text for SA Objectives 11, 12 and 13 on accessibility of services, community cohesion and culture/recreation, have also been grouped together. This is because the indicators used in the assessment for the grouped together SA Objectives are largely similar and grouping them together in this way saves space and avoids unnecessary repetition. Whilst the summary of effects text is grouped together, separate scores and characteristics of effects are provided for all SA Objectives. An appraisal is provided for every single option and alternative against every SA Objective. The predicted effects are evaluated for their probability, geographical extent, reversibility, permanence, magnitude and significance.</p> <p>The assessment text is intended to be comprehensive, robust and to satisfy the technical requirements of SA and SEA whilst also being accessible for the general public and avoiding unwieldy and excessively long tables or appendices. For this purpose, the writing</p>

Characteristic	Rationale
	<p>style of assessment text adopts a slightly shorthand approach.</p> <p>The following symbol is used during the appraisal text: ‘→’. This is predominantly intended to mean ‘would lead to’.</p> <p>For example, an impact of a policy on GHG emissions might usually read:</p> <p>“Policy P1 would be likely to enhance public transport options for people in Bradford. This would be likely to lead to a reduction in GHG emissions from the transport sector.”</p> <p>For such an impact, the shorthand style of assessment text would read:</p> <p>“P1 → enhanced public transport → reduction in GHG emissions from transport”.</p>
Probability	<p>There is an inherent degree of uncertainty in appraisals carried out in SA. Should it be adopted, the CSPR would likely be in force for several years, over which time could potentially arise unforeseen circumstances as baseline data unexpectedly changes.</p> <p>For example, any given community facility in Bradford could potentially close down or move within a period of months, and thus an assessment which considers that a CSPR policy would provide new residents with good access to this facility pre-development, may not do so by the time construction begins. These circumstances are impossible to predict. The planning system is generally robust enough to deal with such changes by re-assessing the needs of sites/communities at the time applications are made.</p> <p>Uncertainties are dealt with in SA by adopting a precautionary approach, wherein the worst-case scenario is assumed unless reliable evidence suggests otherwise.</p> <p>Assessment tables include a column indicating whether there is considered to be a Low, Medium or High probability of the effect taking place.</p> <p>Where the recorded effect is ‘uncertain’, the probability is recorded as ‘Low’.</p> <p>Where the recorded effect is ‘neutral/negligible’, the probability is recorded as ‘High’. This is because a precautionary approach is adopted and, as such, unless there is a high probability of the effect being neutral/negligible then the worst-case scenario is assumed.</p> <p>Probability is an evaluative judgment of the SEA/SA experts carrying out the appraisals.</p>
Duration and short-, medium- and long-term effects	<p>Assessment tables include a column indicating whether the effects are considered to be Short-, Medium- or Long-term.</p> <p>Short-term effects reside for 0-10 years after Plan adoption;</p> <p>Medium-term effects reside for 10-20 years after Plan adoption; and</p> <p>Long-term effects last beyond the Plan period.</p> <p>Effects can be multiple terms, such as arising in the short-term and residing in the long-term. In the assessment tables, the longest term is used to indicate the duration i.e. the assessment indicates the duration of the effect but not necessarily when it will initially arise.</p>
Reversibility	<p>Assessment tables include a column indicating whether effects are considered to be reversible or irreversible. The intention is not to suggest whether or not the effect is going to be intentionally reversed, but rather to indicate if it is theoretically possible that the effect could be reversed.</p> <p>R = Reversible; and</p> <p>IR = Irreversible.</p> <p>The majority of effects caused by the Plan would typically be reversible.</p>
Permanent and temporary	<p>The assessment tables include a column to indicate whether the identified effects are considered to be permanent or temporary:</p>

Characteristic	Rationale
	<p>T = temporary; and P = permanent.</p> <p>Should the Plan be adopted, it would only be in place for the Plan period and would subsequently be replaced by a new Plan. Many of the effects of policies in the proposed Plan are therefore typically temporary effects. However, it is possible for some effects to be permanent, such as if a policy were to result in new development on a greenfield site - that land will now always be previously developed land and any loss of soils from the site is considered to be permanent.</p>
<p>Positive &amp; negative effects and significance</p>	<p>The assessments identify and evaluate the sustainability effects of all policies in the Plan, including positive, negative and neutral effects. The range of predicted effects includes:</p> <p>Major positive - The proposal significantly contributes to the achievement of the SA Objective;</p> <p>Minor positive - The option contributes partially to the achievement of the SA Objective;</p> <p>Uncertain – It is not possible to determine the nature of the impact;</p> <p>Neutral - Relationship between the option and the SA Objective is negligible;</p> <p>Positive/negative – A combination of positive and negative contributions to the SA Objective;</p> <p>Minor negative - The option partially detracts from the achievement of the SA Objective;</p> <p>Major negative effects - The proposal significantly detracts from the achievement of the SA Objective.</p> <p>For the purpose of the SEA Directive, effects noted as ‘major adverse’ or ‘major positive’ are considered to be ‘significant’. The SEA directive necessitates a focus on ‘significant’ effects. Determining whether an effect is significant or minor is an evaluative judgment based on expert opinion, best practice and industry standards. It is also guided by Annex II (2) of the SEA Directive, which states:</p> <p>“The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</p> <p>The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;</p> <p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,</p> <p>Environmental problems relevant to the plan or programme; and</p> <p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).”</p> <p>Minor effects (i.e. insignificant effects) are also identified. This is because identifying minor effects assists with the identification of cumulative and synergistic effects (e.g. several minor effects combined to have a significant effect), can help to identify opportunities for enhancements (e.g. enhancing a minor positive effects to make it significant) and also better enables the Council to make a more informed decision over the sustainability performance of options.</p> <p>A positive effect would typically be one where the Plan proposal would be likely to contribute towards the aims of the SA Objective, whereas an adverse effect would be one where the Plan proposal conflicts with the Objective. Typically, if a proposal would be expected to have a positive effect(s) to the same extent that it would have an adverse effect(s), a +/- score is awarded. However, if it is considered to be likely that the adverse effect(s) would be of a notably greater magnitude than the positive effect(s), then an</p>

Characteristic	Rationale														
	<p>adverse score is awarded in-line with the precautionary principle.</p> <p>Assessments carried out in SEA operate at a very high level and so the results for options and alternatives that are only slightly different to one another can appear very similar. It might be that one option would have an effect that is of a slightly greater magnitude than the effect of another option, but the effects of both options are both significant and so they would both receive the same score.</p> <p>The assessment tables include a column that displays an overall score for each policy against each SA Objective that indicates the overall effect, as follows:</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th style="background-color: #f1c40f;">Major negative</th> <th style="background-color: #f1c40f;">Minor negative</th> <th style="background-color: #f1c40f;">Neutral / negligible</th> <th style="background-color: #f1c40f;">Positive &amp; negative</th> <th style="background-color: #f1c40f;">Uncertain</th> <th style="background-color: #f1c40f;">Minor positive</th> <th style="background-color: #f1c40f;">Major positive</th> </tr> </thead> <tbody> <tr> <td style="background-color: #e74c3c; color: white;">--</td> <td style="background-color: #f08080; color: white;">-</td> <td style="background-color: #95a5a6; color: white;">0</td> <td style="background-color: #2980b9; color: white;">+/-</td> <td style="background-color: #f1c40f; color: white;">?</td> <td style="background-color: #2ecc71; color: white;">+</td> <td style="background-color: #27ae60; color: white;">++</td> </tr> </tbody> </table>	Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive	--	-	0	+/-	?	+	++
Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive									
--	-	0	+/-	?	+	++									
Frequency	All effects of the Plan are considered to occur once, unless indicated otherwise.														
Cumulative nature and synergistic effects	<p>This SA provides an appraisal of all policies in the Plan. These policies are not going to be adopted in isolation and so it is important to identify and evaluate the cumulative impacts of all policies in-combination. A cumulative effects appraisal has also been carried out for this purpose. Cumulative and synergistic effects are defined as follows:</p> <p>Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect; and</p> <p>Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts.</p> <p>The cumulative effects assessment in this report accounts for both cumulative and synergistic effects.</p>														
Transboundary nature	The assessment table includes a column to indicate the likely geographical extent of effects. In most cases this extent is 'Bradford District', however, where effects would be likely to be discernible in neighbouring authorities or at a scale greater than Bradford, this is specified.														
Secondary effects	<p>The assessment process inherently includes a consideration of secondary effects. The assessment text avoids specifically signposting whether the identified effect is primary or secondary.</p> <p>Secondary effects are defined as follows:</p> <p>Secondary effects are effects that are not a direct result but occur away from the original effect or as a result of a complex pathway.</p>														
Baseline trends	<p>For each SA Objective an analysis of the baseline data gathered during the SA Scoping has been carried out to determine the likely future baseline trends. This indicates whether the baseline is currently improving, declining or static with regards to moving towards the SA Objectives as per the following key.</p> <table border="1" style="width: 100%; text-align: center;"> <tbody> <tr> <td style="background-color: #f08080; width: 33%;">Declining</td> <td style="background-color: #add8e6; width: 33%;">Static</td> <td style="background-color: #2ecc71; width: 33%;">Improving</td> </tr> </tbody> </table>	Declining	Static	Improving											
Declining	Static	Improving													
Recommendations	Alongside the assessment results recommendations are made. These are measures which, if adopted, would be likely to help avoid or minimise negative impacts or to enhance positive impacts. The SA seeks to make recommendations in all cases where negative impacts have been identified – where this is not feasible it is explained in the assessment														

Characteristic	Rationale
	<p>boxes.</p> <p>It is considered that policies not under review are unlikely to be able to incorporate recommendations and as such recommendations have only been made for policies that are under review.</p>

### 3.5 B5: Recommendations

Mitigation involves putting in place measures to prevent, reduce or offset any identified adverse sustainability effects. Measures may also include recommendations for enhancing positive effects. The first priority should, however, be avoidance of adverse effects. Only when all alternatives that might avoid an adverse effect have been exhausted, should mitigation be sought to reduce the harmful effect.

Recommendations are made alongside the appraisal results on an option by option basis. Recommendations are also made alongside the cumulative effects assessment. A summary of recommendations made in this SA is provided in Chapter 4.

In addition to recommendations made in this SA Report it is expected that policies in the CSPR would help to mitigate impacts of other policies. For example, a policy on ensuring that development protects and enhances biodiversity would be likely to help avoid and minimise the negative impacts on biodiversity caused by a policy that proposes new development. This is taken into consideration primarily during the cumulative effects assessment.

### 3.6 B6: Monitoring

A monitoring system should be prepared and proposed that, if adopted and followed, would enable the LPA to ensure that the Plan is resulting in the predicted effects and that avoidance, mitigation or compensation measures that were adopted are working as planned. This provides the opportunity to alter measures to make them more effective. This will be prepared during the next stage of the SA process to accompany Regulation 19 consultation on the CSPR, when the content of the CSPR are closer to being final.

## 4 Stage B: Developing Alternatives and Assessing Effects Results

### 4.1 B1: Vision

The Council's Vision for Bradford, which is unchanged from that in the Adopted Core Strategy, is that by 2037 *'the Bradford District*

*Has become a key driver of the Leeds City Region's economy and a much sought after and desirable location where people want to live, do business, shop and spend their leisure and recreation time. The District has demonstrated that it is a place that encourages sustainable lifestyle choices and responds positively to the challenge of climate change.*

*The growth of the City of Bradford and the towns along Airedale and Wharfedale has been supported by a significant increase in the delivery of new houses, both market and affordable. This growth has driven the economic and social transformation of the District. Sustainable development and management has been at the heart of this growth and prosperity. The District's unique landscapes, heritage and biodiversity assets have played a vital role in making great places that encapsulates what makes Bradford so special.*

*Economic transformation of the District has been achieved based on Bradford's key strengths of its unique young, growing and international workforce as well as its culture of entrepreneurship, high-quality places where businesses can thrive and its rich historic and cultural identity and wealth of environmental assets'.*

The Council's Vision for the District is considered to be highly compatible with a range of SA Objective. It would help to ensure that investment and enterprise in Bradford respects the needs of the local area and to increase local levels of investment, spend, economic growth and the number of business start-ups and survival. The District's employment rate would be likely to increase, as too would average earnings, with the number of high-quality jobs suited to the local workforce increased. These new employment opportunities would provide local people with the opportunities to build their skills whilst enhancements to local education facilities could be an indirect result of economic growth in the District.

Economic growth and social transformation across Bradford would be likely to help secure the delivery of residential development that satisfies local requirements and improves the quality and cohesiveness of neighbourhoods. Higher rates of employment with higher-quality jobs as well as new affordable housing would make a significant contribution towards reducing deprivation, poverty, inequality and homelessness with subsequent benefits to the health and safety of Bradford's residents. Furthermore, the new economic development and investment would be likely to enhance the recreational, cultural and leisure offering in the District.

The Vision gives considers closely the important biodiversity, cultural heritage and character of Bradford and it is likely that it would help to ensure that habitats, landscapes, townscapes, heritage assets and historic areas are protected and enhanced by development.

There is a risk that the significant economic development could lead to an increase in the number of local car movements along with increased pressure on the capacity of public transport options. However, it is understood that the pursuit of 'sustainable development' and 'high-quality places' includes enhancing the capacity and quality of walking, cycling and public transport options as well as working to reduce the distances people need to travel, or reducing their need to travel all together, and this would help to ensure that local movements are efficient and relatively low-emission. Whilst 'sustainable development' likely includes a consideration of reducing the District's contribution to the causes of climate change (e.g. managing greenhouse gas emissions and carbon sink capacity), the Vision could potentially place greater emphasis on the need to this in light of the economic and social transformation being sought.

### 4.2 B1: Strategic Objectives

In order to achieve the Vision, the Council have proposed the following 16 Strategic Objectives for the CSPR:

1. To recognise and fully exploit the role of the City of Bradford and the towns along Airedale and Wharfedale as dynamic locations of choice for housing and economic growth within the Leeds City Region.
2. To ensure that the District's needs for housing, business and commerce are met in full in sustainable locations that reduce the need to travel and are well served by public transport and services, whilst prioritising, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.
3. Ensure that the appropriate critical infrastructure (including green and social) is delivered to support growth and the timing of development and infrastructure delivery are aligned.
4. To significantly improve the quality of new development and ensure that new housing schemes create inclusive, accessible, distinctive and healthy places that incorporate green streets and spaces and make efficient use of resources;
5. To provide a range of quality dwellings, in terms of type and affordability, in well-designed liveable neighbourhoods to cater for the current needs and future growth of the District and to ensure that the housing needs of all parts of the community including specialist needs are met.
6. To promote the role of the Bradford District in the Leeds City Region economy by creating conditions for housing growth, city living and enterprise where business thrives, generating opportunity, prosperity and jobs.
7. To promote and support a successful growing economy with a wide range of high-quality employment opportunities, by fostering indigenous firms and by attracting inward investment in the high value creative, innovative and knowledge-based industries.
8. To promote, manage and develop the image and the role of Bradford City Centre as a regionally significant business, commercial, shopping, civic and cultural area.
9. To develop our skills, training and education base through new development and support the University of Bradford and the District's colleges and schools in investing in buildings and spaces to ensure a well-educated and skilled workforce.
10. To improve and develop excellent public transport and highway systems to increase the level of accessibility within the District and establish good connections with other parts of the Leeds City Region and the country by ensuring safety, efficiency and sustainability.
11. To ensure that Bradford is a diverse city where socially inclusive and vocal communities live and where the needs of citizens are met through improved access to good quality homes, jobs, shopping, cultural facilities, health and education provision and community facilities for a growing population.
12. To provide a clean, safe, secure, sustainable, attractive and accessible built and natural environment in order to reduce the fear of crime and disorder and foster a shared sense of civic pride and responsibility, supporting the social, economic and physical regeneration of neighbourhoods across the District.
13. Safeguard, enhance and promote the diverse historic built and natural heritage of the District which helps reinforce the local distinctiveness of places.
14. To improve air quality and reduce the impact of climate change through mitigation and adaptation, particularly through reducing emissions, energy consumption, the risk of flooding, and promoting the use of renewable and low carbon energy and securing the means to become locally self-sufficient.
15. Provide accessible and varied opportunities for leisure and recreation including access to the countryside, provision of open space and the utilisation of green infrastructure spaces and routes for walking and cycling.
16. Ensure that new development provides a biodiversity net-gain and safeguard and enhance the District's biodiversity assets through careful landscape, woodland and waterways management. In particular the South Pennine Moors and upland fringe.
17. Safeguard and enhance the District's natural and renewable energy resources, including water, agriculture, woodland and minerals, and promote the sustainable management of waste and recycling.
18. To create and deliver healthy places in Bradford District that maximise health and well-being benefits for residents and visitors, provide opportunities for healthy lifestyles and reduce health inequalities.

Table 4-1 present the assessment of the compatibility between Strategic Objectives in the CSPR with SA Objectives. Overall the Objectives are all considered to be highly compatible with limited potential for conflict. It is necessary for the Objectives and Vision to be read as a whole – it is likely that the achievement of some Objectives would help to mitigate potentially negative impacts of other Objectives.

Table 4-1: Compatibility of CSPR objectives with SA Objectives

		-- Major incompatible		- Minor incompatible			O Neutral		? Uncertain		+ Minor compatible			++ Major compatible					
CSPR Objectives	SA Objectives																		
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
Vision	-	-	-	?	-	-	?	++	-	?	++	++	++	++	++	++	++	++	++
	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	++	++	++	++	++	++	++	++
1	Strategic Objective 1 would be expected to help ensure that there is significant and regenerative residential and economic growth in the District that satisfies local requirements. In addition to the direct contributions to housing, employment and economic growth, this Spatial Objective would be likely to reduce poverty, deprivation, inequality and homelessness and subsequently deliver more cohesive and sustainable communities within which local people can pursue safe, secure and healthy lifestyles. There is a risk that this development would not conform with some SA Objectives due to the likely increase in energy consumption, waste generation, greenfield development, habitat loss and fragmentation, water consumption and air pollution associated with new development. Impacts on character, climate change resilience and transport largely depend on the location of development in relation to flood risk zones, landscapes/townscapes and public transport options.																		
2	++	+	++	+	+	+	+	+	++	++	++	++	+	+	+	+	+	++	++
2	Strategic Objective 2 would help to ensure that development requirements in Bradford can be met, including housing and employment requirements. Achieving this would also be likely to reduce poverty, deprivation, inequality and homelessness and subsequently deliver more cohesive and sustainable communities within which local people can pursue safe, secure and healthy lifestyles. There is a commitment to sustainable development and prioritising PDL and this would help to counter the potentially negative impacts of significant levels of residential and economic development on other SA Objectives.																		
3	+	O	O	O	O	+	+	+	+	++	++	++	++	++	++	++	++	++	++
3	Strategic Objective 3 would be expected to help ensure that sites for development are viable and deliverable and subsequently that the development can proceed. This would enable local development requirements to be met. The provision of social and GI conforms well with natural environment and social-based SA Objectives. GI provides Bradford with a range of ecosystem services, including habitat connectivity, biodiversity value, carbon storage, flood risk alleviation, water filtration and character and setting enhancements.																		
4	O	O	O	O	+	+	+	+	+	+	+	+	++	+	+	++	O	+	+
4	Strategic Objective 4 would conform well with Objectives related to ensuring that the diverse housing needs of the District are met, that neighbourhoods included green and open spaces that offer opportunities for community interaction as well as supporting wildlife whilst benefitting the local character. Strategic Objective 4 also conforms well with improving the health of local people and enhancing the cohesiveness of communities and accessibility for all.																		
5	+	O	+	O	O	O	++	++	+	+	++	++	++	++	++	++	+	+	+
5	Strategic Objective 5 would be expected to help ensure that not only are Bradford’s development requirements satisfied over the Plan period, including type and affordable housing requirements, and in so doing reduces poverty, deprivation, inequality and homelessness, but that the development is of a high-quality design that protects and enhances the local character and setting.																		
6	-	-	-	?	-	-	?	?	-	O	++	++	++	++	++	++	++	++	++
6	Strategic Objective 6 would be expected to help ensure that there is significant and regenerative economic development in Bradford. There is a risk that the energy, water and materials consumption associated with this development, as well as the travel and other sources of emissions, could discord with some SA Objectives. Impacts on some SA																		

CSPR Objectives	SA Objectives																		
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
	Objectives, such as climate change resilience, are uncertain due to the unknown location of development in relation to constraints.																		
7	-	-	-	?	-	-	?	?	-	0	++	++	++	++	++	++	++	++	++
	Strategic Objective 7 would be expected to help ensure that there is significant and regenerative economic development in Bradford. There is a risk that the energy, water and materials consumption associated with this development, as well as the travel and other sources of emissions, could discord with some SA Objectives. Impacts on some SA Objectives, such as climate change resilience, are uncertain due to the unknown location of development in relation to constraints.																		
8	-	-	-	?	-	-	?	++	-	0	++	++	+	++	+	+	+	++	++
	Strategic Objective 8 would be likely to encourage investment and enterprise in the District and to increase the number of high-quality employment opportunities accessible to local people. The Objective would also be likely to help enhance the cultural, recreational and communal spaces, facilities and activities on offer in the District. There is a risk that the energy, water and materials consumption associated with this development, as well as the travel and other sources of emissions, could discord with some SA Objectives. Impacts on some SA Objectives, such as climate change resilience, are uncertain due to the unknown location of development in relation to constraints.																		
9	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	++	++	++
	Strategic Objective 9 would be expected to help ensure that education facilities and opportunities in Bradford improve in quality and capacity. This would also be likely to provide local people with more employable skills and to increase the local pool of potential employees for businesses in the District.																		
10	++	0	0	0	0	0	0	0	++	++	0	++	+	+	+	+	+	+	+
	Strategic Objective 10 would be expected to conform with several SA Objectives as a result of the improvements to the quality and capacity of public transport options. The enhanced accessibility should also better enable people to reach key services, amenities and employment areas efficiently. Short and lower-emission travel would conform well with SA Objectives related to improving air quality and reducing GHG emissions.																		
11	+	0	0	0	0	0	0	0	+	+	+	++	++	++	++	++	++	++	++
	Strategic Objective 11 conforms well with several SA Objectives, particularly those related to cohesive communities, recreation and culture and the accessibility of services.																		
12	0	0	0	0	0	0	0	0	0	0	++	++	++	++	++	++	++	+	+
	Strategic Objective 12 would be likely to help ensure that new development makes a positive contribution to the local character and setting whilst being of a high-quality design that enables secure and safe lifestyles at home whilst contributing towards the cohesiveness of communities. High-quality design could increase footfall in central areas whilst the intention of providing an attractive and safe natural environment could enhance the local outdoor recreational offering whilst benefitting GI, habitats and species. It therefore conforms well with several SA Objectives.																		
13	0	0	0	0	0	0	++	++	0	0	0	0	0	++	0	0	0	0	0
	Strategic Objective 13 naturally conforms well with SA Objectives related to cultural heritage, cultural activities as well as townscape character.																		
14	++	0	0	++	0	0	0	0	++	++	0	0	0	0	0	0	0	0	0
	Strategic Objective 14 conforms with SA Objectives related to reducing Bradford’s carbon footprint as well as enhancing its resilience to the potential impacts of climate change, particularly flooding. Achieving this Strategic Objective would likely require enhancements to the public transport offering in the District. Reducing GHG emissions would be expected to conform well with efforts to improve air quality.																		
15	++	0	0	+	0	+	0	0	++	++	0	++	++	++	++	+	0	+	+
	Strategic Objective 15 conforms well with SA Objectives related to community cohesiveness, recreation, culture and the accessibility of services. Enhanced walking and cycling options would contribute to a more efficient and lower-emissions transport sector whilst providing physical activity opportunities to local people.																		

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CSPR Objectives	SA Objectives																			
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy	
16	+	0	0	+	+	++	++	+	0	0	0	0	0	+	0	0	0	0	+	
Strategic Objective 16 conforms well with several SA Objectives. The protection and enhancement of biodiversity and ecological connectivity is relevant to several themes of SA, including the biodiversity, landscape, heritage, and culture related SA Objectives.																				
17	++	++	++	0	++	++	+	+	0	0	0	0	0	+	0	+	0	0	0	
Strategic Objective 17 conforms well with SA Objectives on renewable and efficient energy, biodiversity, land and soils as well as materials and waste.																				
18	0	0	0	0	0	0	+	+	0	0	+	+	+	+	+	++	0	0	0	
Strategic Objective 18 conforms well with objectives related to improving health and reducing health inequalities, as well as cohesive communities, high-quality home environments and safety & security.																				

### 4.3 B3 & B4: Policy options

All policy options and reasonable alternatives listed in Table 3-3 were appraised in line with the rationale presented in Table 3-4. The detailed results of this process are presented in Appendix D.

The Council has considered the options available for the CSPR and identified their preferred options in light of the alternatives dealt with. Table 4-2 presents the list of reasonable alternatives and the Council's justification for rejecting these. Detail on the contents of the reasonable alternatives and how they compare to the preferred options can be found in Appendix D.

Table 4-2: Justifications for the rejections of reasonable alternatives

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
<b>Plan Period</b>		2013-2035/36/37	This alternative results in technically a plan period of at least 22 years but a significant proportion of the plan is already set in the 'past' – the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply.
		2020-2035	This alternative results in a 15-year plan period but the risk that if that plan is adopted in 2022, this will leave only 13 years for strategic policies.
		2021-2037	This alternative results in a 16-year plan period and 15 years for strategic policies (on adoption of the plan in 2022) – reduces forecast total dwelling need by one year and requires potentially up to two years of housing monitoring data from preferred options document stage (2019) to the start of the plan period (2021), with related uncertainties.
		2022-2038	This alternative results in a 16-year plan and 16 years for strategic policies (on adoption of the plan in 2022) – but requires potentially up to three years of housing monitoring data from preferred options document stage (2019) to the start of the plan period (2022), with related uncertainties.
		2020-40	This alternative produces a long range 20-year plan with 18-year strategic policies (on adoption in 2022), however the further the plan period potentially the more unreliable the data with economic forecasts already stretched beyond their original 12-year base model period.
		2013-2035/36/37	This alternative results in technically a plan period of at least 22 years but a significant proportion of the plan is already set in the 'past' – the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply.
<b>SC1</b>	SC1RA1	Update the policy but consider a less extensive range of changes.	This alternative would not deliver a comprehensive strategic approach to a key overview policy.
<b>SC2</b>	SC2RA1	Do not review the policy i.e. the policy remains unchanged from the adopted core strategy.	This alternative could be considered to not be strategic enough in scope.
	SC2RA2	Developing a policy with a more defined and aspirational carbon reduction target (for	The policy makes reference to the District's Climate Change Framework and would align

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		example, a target of becoming carbon neutral.	with the targets set in the framework and the Council's Climate Emergency declaration.
	SC2RA3	Adopting a more succinct policy with technical detail referenced to a new Supplementary Planning Document (SPD).	This alternative could provide insufficient detail and the SPD may lack a useful planning policy framework.
SC5	SC5RA1	Do not review policy – policy would remain unchanged from the adopted core strategy policy.	The Council considered that there was no clear rationale for applying a prioritisation to local Green Belt release ahead of larger urban extensions; the reordered movement hierarchy reflects changes made to other policy areas to reinforce the carbon reduction and air quality improvement priorities. Changes to the road hierarchy is in line with other updated policies.
	SC5RA2	Undertake more limited changes to the policy and retain current Green Belt prioritisation.	This alternative could limit the opportunities for larger urban extensions to deliver ahead of smaller 'local' Green Belt development opportunities.
	SC5RA3	Undertake more limited changes to the policy and delete Green Belt prioritisation element but retain movement hierarchy as drafted in adopted core strategy policy.	This alternative does not align fully with updated transport and other policies, which are focused on carbon reduction and air quality improvements.
SC6	SC6RA1	Do not review policy.	It was unclear how This alternative would directly inform developments and fill gaps within the existing GI network
	SC6RA2	This alternative would include a detailed map of GI in Bradford with targeted areas for improvement.	Work on defining GI detail will be included within both the Site Allocations DPD and a further iteration of the Key Diagram and Sub Area Diagrams, rather than a high-level policy only for which further detailed explanation may be required through the Site Allocations DPD
	SC6RA3	This alternative would lead to a more succinct format of the policy but would be supported by an SPD on GI.	This alternative poses a risk that there would be insufficient detail and the SPD may lack a useful planning policy framework
SC7	SC7RA1	The first alternative identified by the Council is to set out further detail on the land to be removed from the Green Belt and inset settlements.	Rejected at this stage as detailed work still to progress on the Green Belt Selective Review and site options
	SC7RA2	The second alternative identified by the Council was to exclude safeguarded land from the policy.	May provide less certainty regarding longer-term development needs.
	SC7RA3	The third alternative identified by the Council would be to reduce the level of safeguarded land required by discounting the Holme Wood urban extension post-Plan delivery.	Due to the long delivery timeline for the SUE and the early stage of plan-making there will be uncertainty over the exact build out rates within and outside the plan period making the discounting variable potentially unreliable at this stage.
SC10	SC10RA1	The first alternative would be to have no new policy.	This alternative may make it is difficult for applicants to fully consider the importance of healthy communities at a strategic level.
	SC10RA2	The second alternative for SC10 would be to have a policy of more limited scope that also excludes the need for HIAs from major development proposals.	This alternative may lead to a partial or fragmented policy and need for further updates.
	SC10RA3	The third alternative would be to reduce the scale of the policy and refer to an SPD focussed on this topic for supporting detail.	This alternative may pose a risk of insufficient detail and the SPD may lack a useful planning policy framework.
BD1	BD1RA1	The only alternative considered by the Council was to prepare a less extensive update to the policy.	This alternative would not align with other updates made to the Plan.
AD1	AD1RA1	The only alternative considered by the Council was to prepare a less extensive	This alternative would not align with other updates made to the Plan.

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		update to the policy.	
<b>AD2</b>	AD2RA1	A less extensive update to the policy.	This would not align with updates to other policies within the plan
<b>WD1</b>	WD1RA1	The only alternative considered by the Council was to prepare a less extensive update to the policy.	This alternative would not align with other updates made to the Plan.
<b>WD2</b>	WD2RA1	A less extensive update to the policy was considered a reasonable option.	This would not align with updates to other policies within the plan.
<b>PN1</b>	PN1RA1	The only alternative considered by the Council was to prepare a less extensive update to the policy.	This alternative would not align with other updates made to the Plan.
<b>PN2</b>	PN2RA1	A less extensive update to the policy was considered a reasonable option.	This would not align with updates to other policies within the plan.
<b>EC1</b>	EC1RA1	The Council considered undertaking a less significant update to the policy.	This alternative may lead to problems in selecting content and creating divergence between the growth strategy and the updated core strategy policy.
<b>EC3</b>	EC3RA1	The first reasonable alternative identified by the Council was to focus on a narrower range of issues as opposed to a comprehensive overview.	This alternative would not provide a comprehensive overview.
	EC3RA2	The second reasonable alternative identified by the Council was to combine policy EC3 with EC2 (i.e. to have on policy that identifies the employment requirement and also sets out how it will be achieved).	This alternative policy may be difficult to follow.
<b>TR1</b>	TR1RA1	Less extensive changes and more compact policy. May not provide a comprehensive overview of issues	This alternative would not provide a comprehensive overview of issue expected within a key anchor policy.
<b>TR2</b>	TR2RA1	Less extensive changes and more compact policy.	Existing TR2 policy considered out of date and no longer aligns with latest corporate transport strategy (West Yorkshire Transport Strategy, TFN Transport Plan, and the emerging Bradford Transport Strategy 2040) to increase levels of active travel by integrating cycle parking and facilities in new development and encouraging the use of electric vehicles through the integration of charging points in developments.
<b>TR3</b>	TR3RA1	Less extensive changes and more compact policy.	Existing TR3 policy considered out of date and no longer aligns with latest corporate transport strategy (West Yorkshire Transport Strategy 2040, TFN Transport Plan and emerging Bradford Transport Strategy 2040), as it does not take account of the use of electric vehicles as a sustainable mode of transport and the wider sustainability of car use in sustainable travel and thus a more integrated approach to sustainable travel is potentially required.
<b>TR6</b>	TR6RA1	Less extensive changes and more compact policy.	Existing TR6 policy considered out of date and no longer aligns with latest corporate transport strategy (West Yorkshire Transport Strategy 2040, TFN Transport Plan and emerging Bradford Transport Strategy 2040). The need to address inappropriate HGV parking within residential areas is considered a corporate priority, and the Council consider Criteria K. to further support industrial and warehousing sectors by promoting improved freight infrastructure and services.
<b>HO1</b>	HO1RA1	The first reasonable alternative considered	This would represent an uplift on the Local

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		by the Council would be to have no policy change from the housing requirement policy in the existing adopted Core Strategy. This would result in the housing requirement of 2,400 dpa being carried over into the CSPR	housing Need figure of 1703, with subsequent sustainability impacts.
	HO1RA2	The second reasonable alternative considered by the Council would be to pursue a housing requirement lower than the identified housing need of 1,703 dpa.	This would not satisfy the District's housing needs.
HO3	HO3RA1	Population proportionate.	This would result in a substantially greater amount of green belt releases than the preferred option and would not secure regeneration within the City Centre or Canal Road Corridor.
	HO3RA2	Based on the Adopted Core Strategy Proportions.	This would lead to a larger release of green belt land than the preferred option spread among a larger number of settlements.
	HO3RA3	Conform with the settlement hierarchy but to avoid releasing any land from the Green Belt and avoiding density uplift.	This would result in the plan failing to meet the housing requirement of the district in full.
	HO3RA4	Conform with the settlement hierarchy but to avoid releasing any land from the Green Belt with higher densities.	This would risk the plan failing to meet the housing requirement of the district in full.
	HO3RA5	Variant on the preferred option but increases the distribution in certain areas.	This would assume that as yet unidentified sites would be available and so would risk the plan failing to meet the housing requirement of the district in full.
	HO3RA6	variant of the preferred option that would seek to decrease the concentration on the regional city dispersing more development to the areas of the district with higher housing market value, in the bottom two tiers of the settlement hierarchy.	This would increase the overall scale of green belt releases and very significantly increase green belt releases in the Local Growth Centres and Local Service Centres.
HO4	HO4RA1	The first reasonable alternative identified by the Council was to delete the policy due to there being no requirement in the NPPF that requires the phasing of housing delivery.	There is a need to ensure that sites are delivered in a sustainable manner.
	HO4RA2	The second reasonable alternative identified by the Council was to reduce the scale of the policy and focus on delivering developments on PDL first.	This alternative may lack a comprehensive overview.
HO5	HO5RA1	The reasonable alternative identified by the Council was to reduce the minimum net housing density to 30 dwellings per hectare.	Lower density schemes may result in the less efficient use of land and so this alternative could result in the need for future additional land releases.
HO8	HO8RA1	The first alternative would set out specific percentages for the need, type and location of specialist housing for older people on a District or sub area basis	This alternative would reduce flexibility of individual sites to provide an appropriate dwelling mix for the local areas taking into account local evidence of housing mix.
	HO8RA2	The second alternative would require a proportion of larger sites to include plots for custom self-build plots.	This would help give greater certainty to delivery of plots for custom and self build however based on evince of need it is not considered currently justified in terms of what proportion and the location of need.
HO9	HO9RA1	The first alternative would maintain current policy approach of requiring a proportion of homes on larger site to be accessible but not setting out the detailed requirement in relation to optional technical standards.	This would provide flexibility and individual site circumstances to be considered in determining the proportion of homes meeting optional technical standards National policy is clear any policy should clearly set out the proportions and types of accessible homes required
	HO9RA2	The second alternative would not require the	Evidence of need clearly demonstrates that a

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		inclusion of the optional technical standards for housing.	policy requiring optional technical standards for accessible housing is included in the local plan subject to viability. This option would potentially reduce costs of building new homes but not meet identified need.
<b>HO11</b>	HO11RA1	The first alternative would require affordable housing targets below the current policy.	Current evidence in the SHMA demonstrates a need for affordable housing comparable to the current Policy Ho11. This option would potentially improve viability but may provide less affordable housing through market housing to meet identified need.
	HO11RA2	The second alternative would set out an alternative approach to the tenure split and types of affordable housing required.	This would be fully in line with nationally policy in providing at least 10% of affordable homes and low cost home ownership on major development sites. However given the lower affordable housing targets in the central urban areas this would reduce the ability to meet locally identified need for rented affordable housing products and thereby prejudices the ability to meet identified needs.
<b>HO12</b>	HO12RA1	The first reasonable alternative considered by the Council was to deliver enough pitches to satisfy the cultural need, rather than the assessed need, which would be 17 new pitches.	This would increase the scale of pitch provision but given identified turnover rates on existing sites potentially result in an oversupply of pitches and go beyond the requirements of national planning policy
	HO12RA2	The second reasonable alternative considered by the Council was to target no new pitches as the evidence suggests that the turnover of sites would satisfy the need.	This would be reliant on turnover to meet identified need. This would need to be clearly monitored and potentially require a plan review if turnover rates were identified as not meeting needs.
<b>EN2a</b>	ENa2RA1	The first reasonable alternative would exclude the social outcome criteria from the biodiversity net gain section.	It was considered that including social outcome criteria is emerging good practice and provides more balance to the policy.
	ENa2RA2	The second reasonable alternative would seek to achieve a positive social net gain.	This alternative could add undue burdens and costs to a scheme.
	ENa2RA3	The third reasonable alternative would seek to reduce the scale and coverage of the policy.	Risks that this alternative would provide insufficient detail and not address issues in a comprehensive manner.
<b>EN2b</b>	ENb2RA1	The first reasonable alternative would exclude the social outcome criteria from the biodiversity net gain section.	It was considered that including social outcome criteria is emerging good practice and provides more balance to the policy.
	ENb2RA2	The second reasonable alternative would seek to achieve a positive social net gain.	This alternative could add undue burdens and costs to a scheme.
<b>EN6</b>	EN6RA1	The reasonable alternative available to the Council was to retain the existing policy in the adopted Core Strategy.	This alternative would not be as strong as the revised policy.

### 4.3.1 Summary of effects

For each option and alternative a single score was recorded against each SA Objective to indicate the likely overall effect, using a precautionary approach. Table 4-3 presents the scores recorded for all preferred options against all SA Objectives.

For options not under review and that have not changed from the version in the Adopted Core Strategy, a new appraisal is provided. The results of these appraisals are generally aligned with, but not necessarily identical to, those recorded during the SA of the Adopted Core Strategy. This is because those appraisals were carried out up to five years ago and were thus prepared in the context of a different environmental baseline and different sustainability key issues. Some issues are now considered to be more urgent than they perhaps were at the time of the SA of the Adopted Core Strategy, such as revised development requirements or the need to reduce Bradford's carbon footprint in accordance with the climate change

emergency declared by the Council in January 2019. The SA Framework against which options are appraised has also changed.

With regards to the preferred options, the assessments in this SA identified largely positive impacts and frequently significantly positive impacts for Strategic Core Policies. It is expected that these policies would help to ensure that future development in Bradford maximises opportunities for using PDL and limits Green Belt release, particularly when compared with the approach proposed in the Adopted Core Strategy or reasonable alternatives identified during the CSPR. The Strategic Core Policies would also help to ensure that development in Bradford generally contributes towards creating a greener and healthier District, with significant emphasis placed on efforts to improve air quality, enhance biodiversity, reduce the District's carbon footprint and enhance the walking, cycling and public transport offering. It is expected that Strategic Core policies would help to ensure that new employment land and economic development contributes towards significant urban regeneration across the District, including where it is needed most, with the accessibility and quality of employment opportunities likely to improve over the Plan period for all people in Bradford but particularly in key growth sectors such as manufacturing, digital, financial and professional services. The assessment of the Strategic Core policies did record some potential negative impacts that could arise, predominantly due to potential impacts associated with new development. For example, where policies encourage significant levels of new development there is a risk that, whilst the local socio-economic conditions would benefit significantly, local environmental constraints or assets could be impacted by the construction and occupation of new homes. However, assessments in SA typically adopt a precautionary approach wherein the worse-case scenario is appraised. It is expected that other policies in the CSPR designed to help manage development make these worst-case scenarios much less unlikely (as per Table 4-4). Furthermore, the SA at this stage does not appraise the effects of individual site allocations – this will occur in the SA of the Allocations DPD. At this point it will be possible to examine in further detail whether or not these high-level precautionary assessments can be mitigated with the benefit of more detailed, localised information. At this stage, the supporting policy framework in the Core Strategy as a whole is considered to provide a robust and wide-ranging level of protection to avoid such effects.

The sub-area policies were recorded as being highly likely to lead to significant social and economic gains to each sub-area, with residential and employment development likely to be of a scale and type appropriate to each area and situated in the most sustainable locations. The various criteria designed to guide development in each sub-area, as well as the focus of new investment, would be likely to help realise significant regeneration in each sub area with opportunities for using PDL maximised. The detailed consideration of what kinds of development would be appropriate in which locations would help to ensure that the character and setting of the distinctive and historic settlements in each sub-area would be preserved and enhanced. The assessments of sub-area policies did identify some potentially negative impacts when considered with a precautionary approach, primarily due to the risks of new development. Whilst the CSPR and sub-area policies seek to maximise the use of PDL, in some instances there could be significant release of Green Belt land to accommodate residential development (although significantly less Green Belt release and at fewer settlements than is currently proposed in the adopted Core Strategy, and significantly less than in some of the reasonable alternatives). Such development could potentially pose a risk to the character or biodiversity value of sites in the Green Belt, although it is important to bear in mind that these impacts would be mitigated by other policies in the CSPR as per Table 4-4.

The economic policies in the CSPR are predicted to contribute towards major economic regeneration throughout the District with significant growth in jobs (1,600 jobs per annum), a change to the nature of employment, significant growth in key markets that have been identified by the Council and major improvements to the skills learning opportunities for local people. Start-up rates would be likely to increase with entrepreneurship, which is already particularly high in Bradford compared with other local authorities, strongly supported and encouraged by the Council. These opportunities would deliver major societal benefits such as extensive urban regeneration, reduced deprivation, poverty and inequality, greater employment security and higher job satisfaction. The mental wellbeing of local would benefit hugely from this. There are naturally some risks associated with major economic growth and development, particularly for the natural environment. For example, new and increased business operations would lead to some changes to the consumption of natural resources in the District. Whilst these risks would be avoided or mitigated to some extent by other policies proposed in the CSPR as per Table 4-4, it is uncertain the extent to which they would

entirely be so and so some negative impacts for the more natural environment objectives cannot be entirely ruled out at this stage.

The transport and movement policies are predicted to make a major contribution towards Bradford's steady transition towards a low-emission, more efficient and more sustainable transport system where local people have a reduced need to travel and have more sustainable options travelling when they need to do so. Major improvements to the quality and capacity of bus and rail as well as walking and cycling routes are expected. The more sustainable travel facilitated by the CSPR would have various indirect benefits for several SA Objectives, such as improving air quality, reducing carbon footprints, more cohesive communities, enhanced accessibility of key services and amenities as well as benefits for people's health associated with higher rates of walking and cycling.

The housing policies set out the overall quantity of new homes and the spatial distribution for delivering this. The policies also pursue significant growth in the local provision of affordable housing and a mix of housing types that can cater to Bradford's diverse and growing needs. Whilst there are likely to be some risks to natural environment objectives associated with the construction and occupation of this development, there is a major focus on brownfield urban regeneration, high-quality design, healthy places and sustainable communities. The delivery of this housing over the Plan period would be expected to alleviate existing issues related to the local housing stock, such as overcrowded homes, whilst reducing local rates of poverty, homelessness and deprivation.

The CSPR proposes a range of environment policies that would help to ensure that new residential and economic development maximises its positive impacts on the natural environment whilst avoiding and mitigating negative impacts. The Council has recognised the need to achieve a biodiversity net gain and has proposed policies designed to help achieve this, such a new development that provides new and enhanced GI elements and protects local ecological connectivity. Positive impacts are particularly expected in the brownfield locations, which are the focus of the CSPR, and there are likely to be a variety of indirect benefits of this for air quality, carbon emissions, water quality and character.

The mineral policies performed the worst against the SA Framework of all policy themes when viewed from a precautionary standpoint. It is likely that new or increased extraction of minerals or hydrocarbons would deliver significant societal and economic gains to the local area whilst providing new materials necessary for construction or fuel. A local supply of these materials may also be a more sustainable approach than acquiring them from further afield. Whilst the policies set out stringent criteria for proposals for new or expanded extraction, it is not possible to rule out the negative sustainability impacts associated with new or increased extraction sites, particularly those associated with the extraction of fossil fuels. The process of new extraction can pose a significant risk to the environment and character of the local area, particularly if there is an open-cast mine. Whilst these risks and impacts would to some extent be avoided or mitigated by the criteria proposed in the mineral policies as well as the requirements of other policies, they are unlikely to be entirely avoided or mitigated.

Waste management policies are predicted to help enhance the sustainability and efficiency of waste management in Bradford and would be likely to contribute towards the increasing rates of reduce/re-use/recycle in the District. Some potentially negative impacts have been identified associated with new waste management facilities sites or new HGV movements for transporting waste, such as impacts on air quality.

The design policies proposed in the CSPR would be expected to help ensure that negative impacts of new development are avoided or mitigated, whilst positive impacts are maximised. They would be particularly likely to help make places throughout Bradford greener, healthier, regenerative, visually attractive, sustainable and accessible for all people via all modes of transport.

The implementation and delivery policies were recorded as resulting in mostly uncertain or negligible impacts on SA Objectives. These policies would be expected to help ensure that future development is viable and that the necessary infrastructure is in place and so positive impacts on the housing, economy and employment SA Objectives were considered to be likely as a result of Bradford's development needs being met. However, it was largely not possible to predict impacts on other SA Objectives with any certainty. For example, ID3 would seek to secure developer contributions and whilst it is expected this would lead to a range of benefits for local communities there is a lack of clarity in the policy over how these contributions would be invested (note: it is expected that money from contributions would be invested in line with policies

elsewhere in the CSPR, such as sub-area policies that set out where investment would be focussed for the Bradford, Airedale, Wharfedale and Pennines sub-areas, but this can only be taken into consideration during the cumulative effects assessment).

### 4.3.2 Policies HO1 and HO3: Summary of effects

Policy HO1 establishes the housing requirement for the District over the Plan period, whilst HO3 establishes the Council's preferred spatial distribution for accommodating this development. Both policies represent the overall strategic approach to satisfying the District's housing requirements, which is a fundamental goal of the CSPR. Both policies are tightly linked with one another and underpin most other policies in the CSPR as well as future decisions to be made during the Council's preparation of the Allocations DPD. It is therefore appropriate to closely consider the potential impacts of each policy and their alternatives.

In summary, the Council's preferred option for the quantity of residential development is to secure 1,703 dwellings per annum. The Council considered two reasonable alternatives to this:

- HO1RA1 - To have no policy change from the housing requirement policy in the existing adopted Core Strategy. This would result in the housing requirement of 2,476 dpa being carried over into the CSPR; and
- HO1RA2 - To pursue a housing requirement lower than the identified housing need of 1,703 dpa.

The Council has recently undertaken new analyses to calculate the housing needs of the District over the Plan period and these needs are considered to be significantly lower than those identified during the preparation of the Adopted Core Strategy. The Council's preferred approach would be to establish a housing requirement in the CSPR in line with the reduced housing need, although has recognised that continuing with the existing requirement in the Adopted Core Strategy (HO1RA1) could be a reasonable alternative to this.

In both the preferred approach and HO1RA1 it is expected that each housing requirement would lead to significant urban regeneration across the Borough with major societal and economic benefits. The delivery of new housing that as a minimum satisfies the needs of Bradford's diverse and growing population would contribute significantly towards urban regeneration throughout the District and reducing homelessness, deprivation, inequality and poverty. It would also help to tackle overcrowding in the District, which is a key sustainability issue locally. Such residential growth would also facilitate economic growth, providing businesses with a large and accessible pool of potential employees. The second reasonable alternative considered by the Council was a quantity of housing lower than the need (HO1RA2). This alternative would not only be unlikely to deliver these benefits but, if it were to fail to accommodate Bradford's forecast population growth, it could also risk exacerbating issues related to homelessness, deprivation, poverty, inequality and overcrowding whilst constraining the local employment and harming the operation of local businesses. It is therefore considered that in terms of the societal and economic spheres of sustainability, the Council's preferred option (HO1) and HO1RA1 are preferable to the alternative of a housing requirement less than 1,703dpa.

There could potentially be some sustainability benefits of a Local Plan that secures less than 1,703dpa. A lower quantity of development would be likely to lead to less greenfield land lost to development and subsequently could help to minimise the risk of negative impacts on natural environment elements of sustainability such as biodiversity, landscape character, water resources and quality, air quality and greenhouse gas emissions. The extent to which this is the case is somewhat uncertain not only because the exact locations and quantities of development are unconfirmed at this stage but also because a reduction in the number of new homes would not limit population growth but rather result in overcrowding and unsustainable living environments. This could also lead to the capacity of services being stretched in areas of over-crowding. It should also be noted that the larger scale of development proposed in HO1 and considered in HO1RA1 would facilitate greater levels of urban regeneration and development on brownfield sites which, in accordance with other CSPR policies, could help to enhance local biodiversity and character. A larger scale of development could also make the provision of new or expanded services and amenities, as well as improvements to the capacity and quality of public transport, more viable.

The significant societal and economic benefits of new development require careful weighing up against the potential risks to the natural environment and in this regard it is considered that HO1 strikes an overall more sustainable balance than HO1RA1 or HO1RA2.

The distribution of new development in the District is closely linked with the quantity of development being pursued. Given the Council's preferred approach is the most sustainable growth strategy of HO1, it is necessary for the CSPR to establish a spatial strategy that could accommodate 1,703dpa in the most sustainable way possible. The Council's preferred option for doing so over the Plan period, as detailed in HO3, is:

- 18,400 (70%) homes towards the Bradford Regional City;
- 4,100 (15%) homes towards Principal Towns;
- 2,600 (10%) homes towards Local Growth Centres; and
- 1,050 (5%) homes towards Local Service Centres.

The Council's preferred distribution has arisen from the Council's approach of seeking to ensure the distribution is aligned with the CSPR Vision and Objectives. It aligns with the District's settlement hierarchy, maximises the benefits of growth such as regeneration and seeks to minimise the potential negative impacts of growth on the natural environment. The proportion of growth directed towards each settlement tier has changed slightly compared with that proposed in the Adopted Core Strategy, primarily because of the lower housing requirement and the updated land supply. HO3 would require approximately 5,000 homes to be accommodated within current Green Belt land, with Green Belt releases in 12 of the 27 different settlements and sub areas. This is significantly lower than the 11,000 homes required for Green Belt land in the adopted Core Strategy. The Council has prepared a Bradford Growth Assessment evidence document which showed that changing the Green Belt to accommodate this would be achievable without harming the strategic or local functioning of the Green Belt.

The Council identified and considered six reasonable alternatives for the spatial distribution of this development:

- HO3 Reasonable Alternative 1 (HO3RA1) would be population proportionate. In comparison with the Council's preferred option, there would be approximately 806 fewer homes directed towards the Regional City of Bradford and they would be distributed markedly differently with minimal development in the two regeneration areas of the City Centre and Canal Rd Corridor and significantly more in other areas including Bradford NE. There would be 689 fewer homes directed towards Local Growth Centres. These homes would predominantly be directed towards Local Service Centres instead, such as Baildon. The amount of development within the Principal Towns would be similar but with slightly more development within Ilkley and slightly less within Keighley;
- HO3 Reasonable Alternative 2 (HO3RA2) would be based on the Adopted Core Strategy proportions. This approach distributes the new lower District-wide housing requirement in exactly the same proportions as in the Adopted Core Strategy. This approach would see 65% of new homes directed towards the Regional City, compared with the 70% proposed in the preferred option. HO3RA2 would then direct a slightly larger proportion of new homes towards Principal Towns, Local Growth Centres and Local Service Centres than the preferred option would. This approach would be highly likely to lead to a significantly greater quantity of Green Belt release, and Green Belt released at more settlements (15 rather than 12), than the preferred option;
- HO3 Reasonable Alternative 3 (HO3RA3) would conform with the settlement hierarchy but to avoid releasing any land from the Green Belt. It would not assume that any further increase in densities compared to those projected within the SHLAA would be secured. This approach would result in a significant shortfall of around 3700 the District-wide housing requirement. Development would be focused on the Regional City and Principal Towns. Those settlements with minimal non green belt land supply options would see the greatest reductions compared to the preferred option – for example Ilkley despite being a Principal Town would only see 150 new homes.
- HO3 Reasonable Alternative 4 (HO3RA4) would conform with the settlement hierarchy but to avoid releasing any land from the Green Belt. In order to achieve this, a higher density of development would be required in the non-Green Belt locations to avoid a shortfall of around 3,700 homes of the District's housing need. Whilst the shortfall could be made up by assuming a density uplift of 20% in the regional

city, 10% in the principal towns and 5% in the local growth centres, there is a risk that this would not be achievable or would not entirely account for the shortfall. It could therefore fail to accommodate all of Bradford's housing needs. There is also a risk that this approach would undermine proposals for regeneration in areas such as Holme Wood where green belt releases would be linked to urban regeneration and investment within settlement and where non-Green Belt site options are relatively limited.

- HO3 Reasonable Alternative 5 (HO3RA5) This is a variant on the preferred option but increases the distribution in certain areas such as the City Centre, Keighley and Bradford SE on the assumption that as yet unidentified potential might be realised via intensification and density uplift. If pursued and if found to be a realistic and deliverable option it would reduce the scale and number of locations for green belt change compared to the preferred option, however with this alternative comes greater uncertainty.
- HO3 Reasonable Alternative 6 (HO3RA6) is a variant of the preferred option that would seek to decrease the concentration on the regional city dispersing more development to the areas of the district with higher housing market value, in the bottom two tiers of the settlement hierarchy. This would increase the overall scale of Green Belt release, with significantly increases in Green Belt releases in the Local Growth Centres and Local Service Centres.

The need to accommodate Bradford's housing requirement should, as discussed above with regards to HO1, be weighed against the risks to the natural environment associated with greater quantities of development. HO3RA3, HO3RA4 and HO3RA5 could potentially pose a lesser risk than other strategies to topics such as wildlife, soils and air quality than the other four options because they would likely accommodate less development whilst focussing on urban development and preventing or minimising development in the Green Belt (there is a high degree of uncertainty about the scale of development HO3RA4 and HO3RA5 would accommodate given their reliance on as yet unidentified locations becoming available and in accordance with a precautionary approach it is assumed they would risk failing to satisfy Bradford's housing requirement). Of the seven housing distribution options (HO3 and six reasonable alternatives) only HO3, HO3RA1, HO3RA2 and HO3RA6 could be expected to accommodate the District's housing requirement. These four options would enable significant societal and economic gains, including urban regeneration throughout the District. HO3RA3 would lead to a shortfall of the housing requirement of approximately 3,700 dwellings over the Plan period. HO3RA3, HO3RA4 and HO3RA5 therefore risk exacerbating issues related to poverty, homelessness, deprivation, inequality and overcrowding whilst only enabling a limited degree of urban regeneration. A spatial strategy that fails to accommodate Bradford's housing requirement could also be detrimental to the local economy due to a more constrained workforce size. The focus on densification of development through HO3RA4 in order to avoid the shortfall that HO3RA3 could further exacerbate issues related to overcrowding.

HO3 would focus more development in urban locations and on PDL than HO3RA1, HO3RA2 and HO3RA6. The Council's preferred option could therefore better enable significant levels of urban regeneration. HO3 would also necessitate a more limited release of Green Belt land and, given the wildlife, distinctive character, natural waterbodies and clean air often found in or near Green Belt locations, could also present a lower risk to the natural environment themes of sustainability than other strategies that could accommodate Bradford'.

The range of key services, facilities, cultural spaces, recreational areas, retail centres and employment opportunities is generally superior in larger settlements such as the regional city or principal towns than it is in smaller settlements such as local growth centres. Bus, rail, walking and cycling routes are also typically of a higher quality and a greater capacity in larger settlements, although it is recognised that residents in principal towns and local growth centres are generally able to reach the regional city fairly efficiently via bus or rail. Directing the majority of development towards larger settlements is, therefore, an effective means of ensuring that new residents have a reduced need to travel and, when they do travel, sustainable options for doing so. More efficient and sustainable movement of local people can make a significant contribution towards improving Bradford's air quality, reducing carbon emissions and delivering major economic gains. Of the seven distribution strategies, HO3RA6 would situate the lowest proportion of development in large settlements. New residents under HO3RA6 could therefore in some instances face longer distances to travel to access services, facilities and employment areas and may have more limited walking, cycling or public transport options for doing so.

HO3RA3, HO3RA4 and HO3RA5 could potentially see a slightly greater proportion of development being directed towards the regional city than the preferred option of HO3 but it is uncertain the extent to which this would be the case. It is also uncertain as to whether they would be able to accommodate enough development in different areas of the city to facilitate major urban regeneration. In comparison, HO3RA1 and HO3RA2 would likely lead to slightly less development being directed towards the regional city than HO3, but both would lead to significantly more development on the Green Belt at the settlement edges.

Overall, it is considered that the Council's preferred option of HO3 strikes the most sustainable balance, when compared with the six reasonable alternatives, in terms of accommodating Bradford's housing requirement whilst avoiding impacts on the natural environment as much as possible; facilitating significant urban regeneration in the areas that need it most; situating residents in locations where they have good access to services, facilities and employment areas and subsequently have a reduced need to travel as well as highly accessible sustainable routes for when they do travel; and ultimately contributing to the District's transition towards cleaner and greener spaces, a lower carbon footprint, cleaner air and more sustainable communities.

### **4.3.3 Mitigating impact through other CSPR policies**

Policies proposed in the CSPR would be likely to help mitigate the potential negative impacts of other policies, as well as to enhance the positive impacts. The above summary and the scores presented in Table 4-3 do not take this into consideration, as they are a summary of the impacts of policies considered in isolation. Table 4-4 provides an overview of the policies that would be likely to help avoid, mitigate or enhance effects for each SA Objective. These are then factored into the cumulative effects assessment in the following section.

Table 4-3: Summary of appraisals of preferred options for policies (full results in Appendix D)

Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive														
--	-	0	+/-	?	+	++	SA Objectives													
Options	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy	
	Presumption in Favour of Sustainable Development																			
P1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Strategic Core Policies																				
SC1	+/-	-	-	++	-	++	++	++	+/-	+/-	++	++	++	++	++	++	++	++	++	
SC2	++	+	++	++	++	++	+	+	++	++	+	+	++	+	+	+	+	+	+	
SC3	+	0	0	+	0	+	+	+	+	+	+	++	++	+	+	+	+	++	++	
SC4	+	0	0	+	0	++	++	+	++	++	++	+	++	++	++	+	++	++	++	
SC5	+	+	+/-	-	+/-	+/-	+/-	+/-	++	++	+	+/-	+/-	+/-	+	+	+	+	+	
SC6	+	0	+	+	+	++	++	+	+	0	0	0	+	+	0	+	0	0	0	
SC7	-	0	-	-	-	-	-	?	+	-	++	-	+	-	0	+/-	-	-	0	
SC8	+	0	+	+	+	++	++	+	+	0	0	0	+	+	0	0	0	0	0	
SC9	++	+	+	+	+	+	++	++	++	++	++	++	++	++	+	+	+	+	++	
SC10	+	+	+	++	+	+	++	++	++	++	++	++	++	++	++	++	+	++	++	
Sub-Area Policies																				
BD1	+/-	+	+	++	+/-	+	+	+	++	++	++	++	++	++	+	+	++	++	++	
BD2	+/-	0	0	+	0	+	+	+	+	++	+	++	++	++	+	+	+	++	++	
AD1	+/-	0	-	?	+/-	+/-	+/-	+/-	+	++	++	++	++	++	+	+	+	++	++	
AD2	+/-	0	+/-	+	+	+	+	+/-	+	++	+	++	++	++	+	+	+	++	++	
WD1	+/-	0	-	-	+/-	+	+	+	+	++	++	++	++	++	+	+	+	++	++	
WD2	+/-	0	0	+	0	+	+	+	+	++	+	++	++	++	+	+	+	++	++	
PN1	+/-	0	-	+	+/-	+	++	++	+	++	++	++	++	++	+	?	?	++	++	
PN2	+/-	0	+	+	0	+	++	++	+	++	+	++	++	++	+	+	+	++	++	
Thematic policies: Economy																				
EC1	--	--	-	?	-	-	-	-	-	+/-	+	+	+	+	0	++	+	++	++	
EC2	-	-	-	?	-	-	-	-	-	+/-	+	+	+	+	0	+	+	++	++	
EC3	-	-	-	?	-	-	-	-	-	+/-	+	+	+	+	0	+	++	++	++	
EC4	+	+	-	+	+	+	+	+	+	+	+	++	++	++	0	+	+	++	++	
EC5	-	-	-	?	-	-	-	-	-	+/-	+	++	++	++	0	+	+	++	++	

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Thematic policies: Transport and Movement																			
TR1	++	0	0	0	0	0	+	+	++	++	0	++	++	++	+	+	+	+	+
TR2	+	0	0	0	0	0	+	+	+	+	0	+	+	+	++	0	0	0	+
TR3	++	0	0	0	0	0	+	+	++	++	0	++	++	++	+	+	+	+	+
TR4	+	0	0	0	0	-	-	++	+	++	0	++	++	++	+	+	0	++	++
TR5	+	0	0	0	0	0	-	+	+	++	0	++	++	++	0	0	+	+	+
TR6	-	0	0	0	0	-	-	0	-	+	0	0	0	0	++	-	0	++	++
TR7	++	+	+	0	0	0	+	+	++	++	0	+	+	+	0	0	0	+	+
TR8	-	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0	0	0	+
Thematic policies: Housing																			
HO1	--	-	--	-	-	--	+/-	+/-	--	-	++	+/-	+/-	+/-	+/-	?	?	+	+
HO2	-	-	-	-	-	-	+/-	+/-	-	-	++	+/-	+/-	+/-	+/-	?	?	++	+
HO3	++	+	+/-	?	+/-	+/-	+	+/-	+/-	+/-	++	++	++	++	+/-	+	+	++	++
HO4	-	-	-	-	-	-	+/-	+/-	-	-	++	+/-	+/-	+/-	+/-	?	?	++	+
HO5	-	-	-	-	-	-	+/-	+/-	-	-	++	+/-	+/-	+/-	+/-	?	?	++	+
HO6	-	-	-	-	-	-	+/-	+/-	-	-	++	+/-	+/-	+/-	+/-	?	?	++	+
HO7	+/-	-	+/-	+/-	-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-	++	++	++	+
HO8	0	0	0	0	0	0	+	+	0	0	++	+	+	+	+	+	+	+	+
HO9	0	+	0	0	0	0	+	+	0	0	++	+	+	+	+	+	+	+	+
HO10	0	+	+	0	0	0	0	0	0	0	++	+	+	+	+	+	+	+	+
HO11	0	0	0	0	0	0	0	0	0	0	++	+	+	+	+	+	+	+	+
HO12	0	0	0	0	0	0	0	0	0	0	++	+	+	+	+	+	+	+	+
HO13	0	0	0	0	0	0	0	0	0	0	++	+	+	+	+	+	+	+	+
Thematic policies: Environment																			
EN1	+	0	++	+	+	++	+	+	+	0	+	++	++	++	0	++	0	0	+
EN2a	+	0	+	+	+	++	++	++	+	0	0	++	+	+	0	+	0	0	+
EN2b	+	0	+	+	+	++	++	++	+	0	0	++	++	++	0	+	0	0	+
EN3	0	0	0	0	0	+	++	++	0	0	0	0	++	++	0	0	0	+	+
EN4	+	0	+	0	0	++	++	++	0	0	0	+	+	+	0	+	0	0	+
EN5	+	0	+	++	+	++	++	++	+	0	0	+	++	++	0	+	0	0	+
EN6	++	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	+	+
EN7	0	0	+	++	++	+	+	0	0	0	0	0	0	0	0	0	0	0	0
EN8	++	+	0	0	++	++	+	+	++	0	0	0	0	0	+	+	0	0	0
Thematic policies: Minerals																			
EN9	-	-	--	0	--	--	--	+	-	-	0	0	+	0	0	-	+	+	+
EN10	-	-	--	0	--	--	--	+	-	-	+	0	+	0	0	-	+	+	+
EN11	--	-	--	0	--	--	--	+	--	-	0	0	+	0	0	-	+	+	+
EN12	--	-	--	0	--	--	--	0	-	-	-	0	+	0	0	-	0	+	+
Thematic policies: Waste Management																			
WM1	-	++	-	-	-	-	-	-	-	-	+/-	0	0	0	-	0	-	0	+

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WM2	-	++	-	-	-	-	-	-	-	-	+/-	0	0	0	-	0	-	0	+	+	
Thematic policies: Design																					
DS1	0	+	+	0	0	0	++	++	0	0	+	0	+	+	+	+	0	0	+		
DS2	+	0	+	+	+	+	++	++	+	+	+	0	+	+	+	+	0	0	+		
DS3	0	0	+	+	+	+	++	++	+	+	+	0	++	+	+	+	0	0	+		
DS4	++	0	+	0	0	0	++	++	++	++	+	+	++	+	+	+	+	+	+		
DS5	+	+	+	0	0	0	++	++	+	+	+	+	++	+	++	+	0	0	+		
Implementation and Delivery Policies																					
ID1	?	?	?	?	?	?	?	?	?	?	?	++	+	?	?	?	?	?	++	++	
ID2	?	?	?	?	?	?	?	?	?	?	?	+	+	?	?	?	?	?	+	+	
ID3	?	?	0	?	0	?	?	?	?	?	?	?	?	?	?	?	?	?	?	0	
ID4	?	?	?	?	?	?	?	?	?	?	?	?	+	?	?	?	?	?	+	+	
ID5	?	?	?	?	?	?	?	?	?	?	?	?	+	?	?	?	?	?	+	+	
ID6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ID7	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	
ID8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	++

Table 4-4: Preferred option policies in the CSPR that would be likely to help avoid, mitigate or enhance effects for each SA Objective (NB the plan must be read as a whole)

SA Objective	Mitigating Policies
1. Energy and GHGs	<p>Policy SC2 and EN6 would support the use of renewable and low carbon energy in the District which would reduce the energy consumption and GHG emissions from traditional energy sources.</p> <p>Policies TR1, TR3, TR7, DS4, SC2-SC5, SC9 and SC10 would support the provision and uptake of sustainable and active travel opportunities in the District which would contribute to reducing vehicular GHG emissions.</p> <p>Policies SC1, SC2, SC6, SC9, SC10, EN1 and EN2 would protect and enhance GI and greenspaces within the District which would ensure the protecting and growth of the District's carbon sink.</p> <p>Policy EN8 would require development to mitigate and offset emissions and impacts in accordance with the Low Emission Strategy for Bradford.</p> <p>HO7 encourages site allocations that provide opportunities for low carbon and renewable energy sources.</p>
2. Waste	<p>Policies WM1 and WM2 support the provision of waste disposal and recycling facilities in Bradford. The policies would encourage recycling, reusing and composting and would be highly likely to reduce the amount of waste sent to landfill.</p> <p>Policies SC2 and HO10 would support the reuse of PDL and existing housing stock which would reduce waste produced through construction.</p> <p>SC9 and SC10 would encourage the efficient use of land and materials and reduce waste generated from construction.</p> <p>Policy HO9 would require strategic housing developments to incorporate appropriate waste management and recycling facilities.</p>
3. Land & Buildings	<p>Policies SC2, SC5 and HO10 would support the reuse of PDL and existing housing stock which would reduce waste produced through construction. HO6 also gives priority to the re-use of PDL and buildings and sets targets for delivery on PDL.</p> <p>Policies SC6, EN1, EN2a, EN2b, EN4 and EN5 would protect and enhance greenspaces in the district.</p> <p>HO5 seeks to maximise densities and so could reduce the need for land.</p> <p>HO7 encourages site allocations that reclaim derelict land.</p>
4. Climate Change Resilience	<p>Policies SC1 and SC2 would seek to reduce and manage flood risk in the District.</p> <p>Policy SC10 would require development proposals to include measures that would mitigate the effects of climate change.</p> <p>Policies SC1, SC2, SC6, SC8, EN1, EN2a, EN2b and EN5 would protect and enhance greenspaces and habitats within the District which would preserve vegetation and permeable soils which would contribute to sustainable flood risk management.</p> <p>HO7 encourages site allocations that minimise negative impacts on flood risk.</p> <p>Sub-area policy BD1 commits to enhancing GI cover in the local sub-area to reduce flood risk.</p> <p>Policy EN7 would increase flood storage, implement SUDs and GI within developments, and actively manage flood risk.</p>
5. Water resources	<p>Policy SC2 would ensure new developments use water resources sustainably, minimising consumption and maximising water recycling.</p> <p>Sub-area policy AD2 would ensure local investment directed towards working with Yorkshire</p>

SA Objective	Mitigating Policies
	<p>Water and the EA, to ensure water and wastewater infrastructure requirements are provided for.</p> <p>EN7 would seek to minimise run off from developments and enhance the ecological value of beck corridors.</p> <p>Policy EN8 would safeguard ground and surface water quality and protect and improve quality, quantity and ecological status of water in Bradford.</p>
6. Biodiversity & Geodiversity	<p>Policies SC1, SC2, SC6, SC8 and EN1-EN8 would seek to protect, enhance and develop greenspaces and sensitive habitats within the District.</p> <p>Policies SC4, DS2 and DS3 would ensure the inclusion of green infrastructure in the design of development.</p> <p>HO7 encourages site allocations that create opportunities for enhancing GI and minimise negative impacts on biodiversity, as well as maximising opportunities for enhancing biodiversity.</p> <p>Sub-area policies BD2, WD2, AD2 and PN2, and policies SC9 and SC10 would protect and enhance GI in developments which would contribute to improvements in ecological connectivity across the District.</p>
7. Landscape & Townscape	<p>Policies SC6, SC8 and EN1- EN8 would protect, enhance and develop the landscapes and character in the District.</p> <p>Policies SC1 and DS1-DS5 would ensure the high-quality design of developments that would protect, complement and enhance the character of surrounding areas.</p> <p>Policy SC4 would seek to develop a strong sense of place and a high-quality public realm in the District.</p> <p>HO7 encourages site allocations that relate well to the form and character of the settlement and do not detract from setting.</p> <p>Sub-area policy PN2 would work with partnerships to protect and enhance the character of natural landscapes in Pennine Towns and Villages.</p> <p>Sub-area policies, BD1, AD1, WD1 and PN1 would ensure that new developments, within the local sub-areas would be of high-quality design that respects, protects and enhances the local character and setting.</p> <p>Policies HO8 and HO9 would help to ensure that new housing is in-keeping with the existing build form in the surrounding area in order to protect local character and setting.</p>
8. Cultural Heritage	<p>Policies SC1 and EN3 - EN5 would protect and enhance the District's historic character.</p> <p>Policies SC9, SC10 and DS1-DS5 would ensure the high-quality design of developments that would protect, complement and enhance the character and historic setting of the District.</p> <p>Sub-area policy PN2 would work with partnerships to protect and enhance the character of distinctive heritage assets and landscapes in Pennine Towns and Villages.</p> <p>HO7 encourages site allocations that relate well to the form and character of the settlement and do not detract from setting.</p> <p>Sub-area policies, BD1, AD1, WD1 and PN1 would ensure that new developments, within the local sub-areas would be of high-quality design that respects, protects and enhances the local character and setting</p> <p>Policy TR4 would improve accessibility of visitor attractions including heritage assets and support the development and maintenance of attractions, such as heritage railways.</p> <p>Policies HO8 and HO9 would help to ensure that new housing is in-keeping with the existing build form in the surrounding area in order to protect local character and setting.</p>

SA Objective	Mitigating Policies
9. Air Quality	<p>Policy EN6 would support the use of renewable and low carbon energy in the District which would reduce the air pollution from traditional energy sources.</p> <p>HO7 encourages site allocations that reduce the need to travel and are accessible via quality public transport services.</p> <p>Policy EN8 would ensure the proactive management of air quality.</p> <p>The sub-area policies and policies TR1, TR3, TR5, TR7, DS4, SC2-SC5, SC9 and SC10 would support the provision and uptake of sustainable and active travel opportunities in the District which would contribute to reducing vehicular air pollution.</p>
10. Transport	<p>The sub-area policies and policies TR1, TR3, TR7, DS4, SC2-SC5, SC9 and SC10 would support the provision and uptake of sustainable and active travel opportunities in the District.</p> <p>HO5 seeks to maximise densities and so could help to reduce the need to travel.</p> <p>HO7 encourages site allocations that reduce the need to travel and are accessible via quality public transport services.</p> <p>Policies TR1, TR2, TR3, TR4, TR5 and TR7 would facilitate a more efficient and integrated transport system in the District.</p>
11. Housing	<p>Policy SC1 would manage the delivery of housing to meet the District's needs.</p> <p>Policies SC4 and HO8-HO13 would ensure the delivery of a wide range of housing that would meet the District's growing and diverse housing needs including the need for affordable homes.</p> <p>Policies SC7 and HO1-HO8 would ensure that the housing needs of Bradford are met.</p> <p>Sub-area policies BD1, AD1, WD1, PN1 and ID1 would ensure that local affordable housing needs are met in the local sub-areas.</p>
12. Accessible Services	<p>Policy SC1 would support the delivery of housing and community services and facilities.</p> <p>Policies SC2, EN1, EN2a and EN2b would enhance outdoor recreational and leisure spaces within the District.</p> <p>Policy SC4 would seek to transform the District's settlements into cohesive, inclusive spaces.</p> <p>Policies SC9 and SC10 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>HO7 encourages site allocations that are accessible to a range of services and community facilities.</p> <p>Sub-area policies BD2, AD2, WD2 and PN2 would direct investments towards the regeneration of town centres, including enhancements to the public realm and retail and leisure facilities, which would improve the access to services and amenities in the local sub areas.</p> <p>Sub-area policies BD1, AD1, WD1 and PN1 would seek to ensure that new community facilities are delivered along with new development which would ensure accessibility for new and existing residents to community services and facilities.</p> <p>Policies EC4 and EC5 would provide new and improved community services and leisure facilities in accessible locations in Bradford.</p> <p>Policies TR1, TR2, TR3, TR4, TR5 and TR7 would facilitate a more efficient and integrated transport system that would enhance accessibility of services.</p>
13. Social Cohesion	<p>DS5 would ensure that developments were designed to accommodate all accessibilities.</p> <p>Policies SC9 and SC10 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>HO7 encourages site allocations that are accessible to a range of services and community</p>

SA Objective	Mitigating Policies
	<p>facilities.</p> <p>Policies EN1, EN2a and EN2b would enhance outdoor recreational and leisure spaces within the District which would support community interaction and social cohesion.</p> <p>Policies EC1-EC3 and EC5 would provide new and improved services and recreational facilities in accessible locations in Bradford.</p> <p>Sub-area policies BD1, AD1, WD1 and PN1 would seek to ensure that new community facilities are delivered along with new development which would ensure accessibility for new and existing residents to community services and facilities.</p> <p>TR1, TR3, and TR5 would enhance walking and cycling options which would facilitate greater social interaction.</p> <p>HO11 would help to ensure that affordable housing needs are met and this would be likely to benefit social cohesion.</p> <p>Policy HO9 would ensure the delivery of high-quality housing that would enable safe spaces for socialisation and support community cohesion.</p>
14. Culture & Leisure	<p>Sub-area policies BD2, AD2, WD2 and PN2 would direct investments towards the regeneration of town centres, including enhancements to the public realm and retail and leisure facilities, which would improve the access to services and amenities in the local sub areas.</p> <p>Policies SC9 and SC10 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>Policies SC1, SC2, EN1, EN2a and EN2b would enhance outdoor recreational and leisure spaces within the District.</p> <p>HO7 encourages site allocations that are accessible to a range of services and community facilities.</p> <p>EC1-EC3 and EC5 would provide new and improved cultural and leisure places and activities in accessible locations in Bradford.</p> <p>Policies TR1, TR2, TR3, TR4, TR5 and TR7 would facilitate a more efficient and integrated transport system that would enhance accessibility of services as well as leisure &amp; cultural areas.</p> <p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities.</p>
15. Safe & Secure	<p>Policy SC1 would ensure that developments are of high quality and well-designed and support social, economic and environmental improvements in the District to promote a sense of safety and security.</p> <p>Policy SC4 would seek to transform the District's settlements into cohesive, inclusive spaces.</p> <p>Policy SC10 would require developments to be designed in a way that makes spaces safe, inclusive and welcoming.</p> <p>HO7 encourages site allocations that avoid posing unacceptable risks to health and safety.</p> <p>Policies HO8-HO12 and sub-area policies BD1, AD1, WD1, PN1 would ensure local housing needs were met and that developments are of a high quality so to support safe and secure lives at home.</p> <p>Policies TR2 and TR6 would ensure that new parking facilities are designed to be safe and secure for people and property.</p>
16. Health	<p>SC1 and SC10 would ensure that developments contribute to the delivery of better health outcomes and contributes to a reduction in health inequalities.</p> <p>SC1, SC2, SC9 and SC10 and EN1 would enhance and preserve the District's green spaces</p>

SA Objective	Mitigating Policies
	<p>which encourage physical activity and improved physical and mental well-being.</p> <p>HO1 would help to ensure that housing needs in the District are satisfied and as such would make a major contribution towards ensuring people can live healthy and secure lives at home.</p> <p>HO7 encourages site allocations that avoid posing unacceptable risks to health and safety.</p> <p>EC1- EC5 would improve access to a range of high-quality employment opportunities which would reduce deprivation and contribute to improvements in mental health and well-being.</p> <p>Policies TR1, TR3 and TR4 would increase active travel opportunities which would have the potential to lead to improved physical and mental wellbeing through increased physical activity.</p>
17. Education	<p>Policies SC1 and SC4 would seek to achieve a wide range of employment opportunities in the District which would provide opportunities for training.</p> <p>Policy EC3 would provide a major boost to local education and skills learning through apprenticeships and higher education opportunities.</p> <p>Policy WD1 would include the provision of an educational facility in Wharfedale.</p>
18. Employment	<p>Policies SC1 and SC4 would seek to achieve a wide range of employment opportunities in the District.</p> <p>Policy SC10 would require proposals to support the delivery of jobs and key services which would lead to local employment opportunities.</p> <p>Policies EC2, EC3 and EC5 would ensure that job requirements stratified local needs and requirements.</p> <p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities which would increase employment opportunities and revenue in the tourism sector.</p> <p>Policy TR6 would support the development of Bradford’s freight industry which would lead to increase employment opportunities and revenue in the freight sector.</p> <p>Policies HO2, HO5, HO6 and HO7 would support the delivery of housing growth which would generate a significant number of employment opportunities within the construction sector and provide a boost to the local economy.</p> <p>All the sub-area policies would ensure good access to employment areas and support local employment opportunities that would provide a boost to the economy in the local sub-area.</p>
19. Economy	<p>Policies SC1 and SC4 would seek to achieve a wide range of employment opportunities in the District which would provide a boost to the local economy.</p> <p>Policy SC3 would seek to support economic growth and ensure there is a balance between housing supply and job demand.</p> <p>Policy SC10 would require proposals to support the delivery of jobs and key services which would provide a boost to the local economy.</p> <p>EC1- EC5 would increase employment opportunities and ensure a sustainable boost to the local economy through supporting the regions focus on research, design, logistics, storage and distribution as well as enterprise and new start-ups.</p> <p>All the sub-area policies would ensure good access to employment areas and support local employment opportunities that would provide a boost to the economy in the local sub-area.</p> <p>HO1 would help to ensure that Bradford’s housing needs can be met and would therefore enable the local economy to continue to grow and compete.</p> <p>Policies HO2, HO5, HO6 and HO7 would support the delivery of housing growth which would generate a significant number of employment opportunities within the construction sector and provide a boost to the local economy.</p>

SA Objective	Mitigating Policies
	<p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities which would increase revenue from the tourism sector.</p> <p>Policy TR6 would support the development of Bradford’s freight industry which would lead to increase employment opportunities and revenue in the freight sector.</p>

#### 4.4 B3 & B4: Cumulative and synergistic effects

In addition to appraising all options being considered for the CSPR individually, an appraisal of the likely cumulative impacts of all options in-combination has been carried out. The results of this are presented in Table 4-5. Because SA requires a precautionary approach, impacts predicted to be positive typically have a high degree of probability whilst negative impacts are generally the worst-case scenario and it can often be the case that the worse-case scenario does not arise. The assessments in the appendices indicate for every option, against every SA Objective, whether the effect is considered to be of a low, medium or high probability.

*Table 4-5: Cumulative and synergistic effects assessment*

SA Objective	Cumulative and Synergistic effects
<p><b>Housing</b></p> <p><b>Safety and security</b></p> <p><b>Health</b></p> <p><b>Land &amp; Buildings</b></p>	<p><b>Positive impacts</b></p> <p>The preferred options in the CSPR would be expected to ensure that everyone in Bradford has the opportunity to live in quality housing that reflects their individual needs, preferences and resources. The Council have carried out objective and robust studies into the District’s housing requirements over the Plan period and it is expected that these diverse and growing needs would be satisfied due to the preferred options of the CSPR. In so doing, the CSPR is predicted to help make a major contribution towards reducing homelessness, poverty, deprivation and inequality in the District. They would also be expected to help alleviate existing overcrowding issues in the District.</p> <p>The CSPR would help to ensure that existing and future residents can live secure, safe active and comfortable lifestyles at home and there are likely to be significant physical and mental health benefits to local people as a result. The CSPR policies closely manage the density of development and this should help to ensure that development gets the correct balance between efficiently using the land resource whilst not being overpopulated or over dense to the point that the quality of life of residents is jeopardised.</p> <p>The proposed spatial distribution of new housing through HO3 maximises opportunities for using PDL and would be likely to lead to significant urban regeneration, particularly where it is needed most. The proposed distribution also makes it likely that residents would have good access to health care facilities, such as doctor’s surgeries and hospitals, due to most development being directed towards the Regional City and Principal Towns. Access to the countryside and a diverse range of natural habitats, which provides opportunities for outdoor exercise and for which spending time in is significantly beneficial to mental health, would also be likely to be very good for new residents. The CSPR policies also seek to ensure that new development is permitted where the necessary infrastructure is available or provided for and in some cases, this would be likely to help ensure that development delivers new or expanded health care facilities and open spaces. The sub-area policies would be highly likely to help ensure that adequate health facilities are in place to accommodate the development proposed in the Regional City, South Pennines, Airedale and Wharfedale.</p> <p>The CSPR seeks to improve the quantity and quality of active travel routes at new development. This is reinforced in numerous policies but is particularly strong in the Design Policies and the Transport Policies. As a result, it is highly likely that new and existing residents and employees in Bradford would have excellent opportunities for walking and cycling to access key services, facilities and amenities and it is highly likely that increased rates of active travel would contribute towards improving physical and mental health and wellbeing.</p> <p><b>Negative impacts</b></p> <p>There could be a risk that new development on greenfield land, which essentially introduces new</p>

SA Objective	Cumulative and Synergistic effects
	<p>homes or businesses to a location where there currently is none, introduces a new potential target of criminal activity.</p> <p>Depending on the precise location of development in relation to health care facilities there could be a risk of the capacity of these facilities being placed under increasing pressure.</p>
<p><b>Energy &amp; GHGs</b></p> <p><b>Air quality</b></p> <p><b>Transport</b></p>	<p><b>Positive impacts</b></p> <p>The transport and movement policies are predicted to make a major contribution towards Bradford's steady transition towards a low-emission, more efficient and more sustainable transport system where local people have a reduced need to travel and have more sustainable options travelling when they need to do so. Major improvements to the quality and capacity of bus and rail as well as walking and cycling routes are expected. The more sustainable travel facilitated by the CSPR would have various indirect benefits for several SA Objectives, such as improving air quality, reducing carbon footprints, more cohesive communities, enhanced accessibility of key services and amenities as well as benefits for people's health associated with higher rates of walking and cycling.</p> <p>Transport policies TR1- TR5 and TR7, as well as Strategic Core Policies SC2, SC3 and Design policies DS2, DS4 and DS5, would be likely to help ensure that walking, cycling and public transport options are improved in quality and capacity and this should help to limit increases in congestion and emissions associated with this. Coupled with EN8 on environmental protection, these policies could help to protect air quality in some locations.</p> <p>With regards to energy consumption, it is likely that SC2 and EN6 would help to facilitate the District's transition towards an increasing reliance on renewable energy and more efficient energy networks. It is unclear if this would entirely negate the impact of the net increase in energy consumption caused by the significant residential development, but it would be likely to have some degree of mitigating effect.</p> <p>In terms of carbon sink capacity, the CSPR proposes several policies that could help to preserve and potentially enhance the capacity in some locations. In particular, SC6, EN2a, EN2b and EN5 could help to result in an increase in aboveground vegetation and to protect the carbon capacity of soils in some locations. It is uncertain if, over the Plan period, a net increase or a net decrease in total tree canopy could be expected.</p> <p><b>Negative impacts</b></p> <p>The CSPR seeks to deliver a significant quantity of development in Bradford (although less than in the Adopted Core Strategy). It is expected that overall, the construction and occupation of 1,703 dwellings a year combined with the significant employment land could lead to a net increase in the District's consumption of energy and the GHG emissions associated with this. There could be some degree of growth in local congestion due to the increase in residents and employees moving, but this would be extensively mitigated by transport policies in the CSPR. New residents in smaller and more rural settlements where public transport options and walking or cycling routes are more limited may need to travel somewhat longer distances to access some key services or amenities.</p> <p>Negative impacts were identified for the mineral policies due to their inherent acceptance of future coal, oil and gas extraction in the District. Extracting fossil fuels from the ground and continuing to rely on them is considered to be incompatible with a climate change emergency given the severe consequences of their associated GHG emissions. It is unlikely that the impact of any future mining on the District's carbon footprint could be entirely mitigated and there is a risk that permitted expanded or new coal, oil or gas extraction could undo the climate change mitigation efforts made elsewhere in the CSPR. The extraction industry also bears consequences for local congestion and air quality given the reliance on HGV movements for transporting minerals for at least part of their journey. Beyond GHG emissions, these extraction activities can also be a major source of noise and air pollution, including dust, PM<sub>2.5</sub> and PM<sub>10</sub>.</p>
<p><b>Waste</b></p>	<p><b>Positive impacts</b></p> <p>The CSPR proposes two waste management policies which, combined with the recently adopted Waste Management DPD, would be likely to help increase rates of reusing and recycling in the District whilst reducing the consumption of materials. In particular, it is expected that new residential</p>

SA Objective	Cumulative and Synergistic effects
	<p>and economic development would enable residents and businesses to conveniently and frequently recycle their waste. Furthermore, the distribution of development proposed in HO3 would situate the majority of new development in the Regional City and Principal Towns. In so doing, it is likely that the majority of new development would be in areas where there are established and effective kerbside collection routes for a wide range of recyclables.</p> <p><b>Negative impacts</b></p> <p>The Housing policies (HO1-HO7) and Economy policies (EC1-EC5) would facilitate significant residential and business/commercial development in the District. The construction phase of this development would be likely to lead to a significant quantity of waste over the Plan-period when considered cumulatively. The occupation and operation of these homes and businesses would also be likely to generate additional quantities of waste over the Plan period and overall it could potentially become increasingly difficult to achieve a continuous decline in the amount of waste sent to landfill.</p> <p>The Minerals policies would facilitate the continued production of primary aggregates and minerals, including sandstone, sand, gravel, fireclay, gas, coal and oil. The extraction of these materials would continue the supply of primary aggregates and minerals and in the process would produce large quantities of waste.</p>
<p><b>Biodiversity</b></p>	<p><b>Positive impacts</b></p> <p>Strategic Core policies, Design policies and Environment themed policies would be expected to help ensure that new development over the Plan period delivers cleaner and greener spaces as well as high-quality GI elements that are of a high biodiversity value. The CSPR recognises the importance of protecting designated biodiversity sites as well as ecological connectivity and it is considered to be likely that over the Plan period the coherence and biodiversity value of the ecological network extending throughout the District will be protected and enhanced. This would better enable the free movement of species.</p> <p><b>Negative impacts</b></p> <p>There is a risk that in some locations in the District, particularly where significant Green Belt release is planned or greenfield land would be used for development, there would be negative impacts on ecological connectivity in the surrounding local area (although as stated above it is expected that ecological connectivity in the District would improve overall). The loss of soils as a result of development on greenfield land would also pose a threat to below-ground biodiversity and the land's ability to support above-ground wildlife.</p> <p>The HRA screening of the CSPR has not been able to objectively rule out a LSE on the South Pennine Moors SAC and SPA, primarily as a result of the cumulative impact of all new development on recreational disturbances at the designation. This is due to be further explored in the appropriate assessment that will be prepared prior to Regulation 19 consultation on the CSPR. Impacts through the pathways of water quality, water resources, air quality and urbanisation impacts will also be explored. Whilst an LSE has not yet been able to be ruled out, it is expected that the HRA appropriate assessment will, if considered to be necessary, determine appropriate avoidance and mitigation measures for inclusion in the CSPR that will ultimately ensure an LSE does not arise.</p>
<p><b>Water resources</b></p> <p><b>Flooding</b></p>	<p><b>Positive impacts</b></p> <p>The CSPR recognises the need for protecting local water resources as well as the quality of natural water bodies (including ecological and chemical statuses). Several policies in the CSPR seek to ensure that development in the District is sustainable and it is expected that this would include water efficiency measures. EC4 sets out a BREEAM standard for development to accord with which could help to ensure more efficient water consumption.</p> <p>There are also several policies in the CSPR which, combined, would be likely to help minimise the risk of development polluting or contaminating water. This is particularly the case with EN8 on environmental protection.</p> <p>With regards to flood risk, the spatial distribution of development proposed in the CSPR would be likely to help ensure that the majority of new development can be directed away from land at risk of</p>

SA Objective	Cumulative and Synergistic effects
	<p>flooding.</p> <p>The CSPR maximises opportunities for using PDL land with significant urban regeneration a key ambition. As a result, greenfield and Green Belt land is avoided as much as is considered to be feasible. In so doing, this strategy would help to limit potential impacts water quality caused by new development on greenfield sites through pollution or contamination impact pathways.</p> <p><b>Negative impacts</b></p> <p>The significant residential and economic growth would be likely to lead to some degree of increase in total water consumption in the District.</p> <p>Whilst the CSPR focuses PDL and regeneration, in some areas of the District there would be significant losses of greenfield land, in part due to the 5,000 homes directed towards the Green Belt (although this is less than half the 11,000 homes directed towards Green Belt and in the Adopted Core Strategy as well as reasonable alternatives identified during the CSPR). In many cases the development could be in proximity to natural waterbodies (including ground water). The construction phase could subsequently pose a pollution or contamination risk to waters, such as at the Rivers Aire, Wharfe and Beck, although this would mostly be mitigated or avoided as a result of Policy EN8.</p> <p>Given the presence of flood zones, including Flood Zone 3, in the Wharfedale corridor it would require careful testing of land supply to ensure that new housing here can all be situated in Flood Zone 1 although early indications are that this would be achievable.</p>
<p><b>Landscape and townscapes</b></p> <p><b>Cultural heritage</b></p>	<p><b>Positive impacts</b></p> <p>The CSPR seeks to ensure that opportunities for reusing PDL and regenerating urban brownfield sites are maximised. Development at these locations would need to accord with the environment and design policies in the CSPR. Overall it is expected that the character and setting of urban areas throughout the District would be protected and enhanced. New development would be of a high-quality design that pays respect to the local character and setting. Overall it is expected that the CSPR would make a major positive contribution towards maintaining, protecting and enhancing the character of Bradford whilst also conserving and enhancing the significance of the District’s heritage assets and historic areas.</p> <p><b>Negative impacts</b></p> <p>There is a risk that the development proposed in the CSPR would alter the local character in some locations of the District. This is a particular risk where new development would be situated on open space, greenfield and the Green Belt as well as where large development sites are situated in smaller and rural settlements such as Local Service Centres. Whilst opportunities for development on PDL and brownfield sites is greater in the Regional City and Principal Towns, it is towards these settlements that the majority of development is directed. There is therefore a risk that in these locations the losses of open space alter the local character and sense of place, although this would be extensively mitigated by design and environment policies.</p>
<p><b>Accessible services</b></p> <p><b>Social cohesion</b></p> <p><b>Culture and leisure</b></p>	<p><b>Positive impacts</b></p> <p>Overall, the proposed distribution of development would be expected to make a major positive contribution towards improving the range and quality of services within communities in Bradford and the connectivity of these services to wider networks. The CSPR would also be expected to help ensure that Bradford’s community becomes increasingly cohesive with an improvement to people’s quality of life and the quality of their neighbourhoods. The cultural, recreational and leisure offering in the District would also be likely to improve.</p> <p>Transport policies in the CSPR would help to encourage greater rates of walking and cycling whilst residential development would be likely to be permeable and to incorporate outdoor amenity space as a result of the Design policies and this would enable outdoor socialising and regular interactions between neighbours. The accessibility of services, social areas and cultural places would be likely to improve whilst in some locations the development proposed in HO1 and distributed through HO3 could enable the provision of new such spaces.</p> <p>It is also important to note that most new residents in Bradford would be likely to live in settlements</p>

SA Objective	Cumulative and Synergistic effects
	<p>with existing good public transport links that provide them with frequent, affordable and sustainable access to Bradford as well as Leeds where the range of services, facilities and recreation space is excellent.</p> <p>The CSPR seeks to directly enhance the leisure, culture and services offering in the District. The Economy themed policies encourage entrepreneurship that would be likely to enable new such businesses to start-up. EC4 and EC5 specifically refer to encouraging economic enterprises that would benefit these SA Objectives. This could be particularly beneficial for Local Growth Centres or Local Service Centres where the range of such businesses is somewhat more limited than in the Regional City.</p> <p><b>Negative impacts</b></p> <p>Depending on the precise location of development there could potentially be a minor risk of the capacity of existing services being placed under increasing pressure in the absence of new or expanded services being provided for.</p>
<p><b>Education</b></p> <p><b>Employment</b></p> <p><b>Economy</b></p>	<p><b>Positive impacts</b></p> <p>The CSPR would be expected to make a significant contribution towards promoting education and training in Bradford. Supporting the University and the colleges and schools in Bradford is a Strategic Objective of the CSPR.</p> <p>The distribution of development proposed in HO3 would be highly likely to ensure that the majority of new residents live in a settlement with excellent education opportunities. Housing site allocation principles of HO7 would be likely to ensure that new homes have good access to primary and secondary schools. Additionally, EC1 seeks to ensure that the local economy is knowledge-driven by supporting the potential of the University of Bradford, Bradford College and other higher education facilities.</p> <p>The significant economic and employment development proposed in the CSPR would also be likely to enhance on-the job skills learning opportunities for local people. Enhancements to the local knowledge industry as well as improved qualifications for local people would provide a major boost to the Council’s efforts to regenerate the local economy by increase the pool of potential high-quality employees.</p> <p>The Council has objectively calculated the potential growth in employment needs in the District and planned to deliver an adequate supply of employment land for support this. The economic policies in the CSPR are predicted to contribute towards major economic regeneration throughout the District with significant growth in jobs (1,600 jobs per annum), a change to the nature of employment, significant growth in key markets that have been identified by the Council and major improvements to the skills learning opportunities for local people. Start-up rates would be likely to increase with entrepreneurship, which is already particularly high in Bradford compared with other local authorities, strongly supported and encouraged by the Council. This employment land would generally be in locations that are highly accessible for all people via all modes of transport. The Sub-area policies would be expected to help ensure that employment needs and economic opportunities at a local level are satisfied and maximised.</p> <p>Overall, it is expected that the CSPR would make a significant contribution towards increasing the number of high-quality job opportunities suited to the needs of the local workforce and supporting investment and enterprise that respects the needs of local areas.</p> <p><b>Negative impacts</b></p> <p>Depending on the precise location of development in relation to education facilities, there could potentially be a risk of the capacity of some schools being placed under increasing pressure.</p>

## 4.5 B5: Recommendations

Alongside the assessment results in Appendix D, recommendations have been made for avoiding or mitigating negative effects as well as enhancing positive effects. Table 4-6 presents an overview of the recommendations that have been made in the SA for each policy theme presented in the CSPR. It is

intended that this table will be updated over time as the SA continues to make recommendations leading up to publication of the Plan.

Recommendations have only been made for policies under review. It is considered that the Council would be unlikely to have the opportunity to make fundamental changes to policies that are not under review.

Table 4-6: Summary of recommendations

Policy theme	Summary of recommendations
Strategic Core Policies	<p>SC1 could seek to incorporate sustainable waste management and the need for high rates of re-use and recycling as a priority for development.</p> <p>SC1 could seek to all ensure that the District’s most ecologically and agriculturally valuable soils are prevented from being lost or irreversibly altered due to development.</p> <p>SC1 could potentially include resource-efficiency, including water efficiency, as a priority.</p> <p>Policy SC2 already makes reference to supporting the implementation of the District’s Climate Change Framework which sets out the carbon reduction targets for the District. However, given that the Council has declared a ‘Climate Emergency’, it may be appropriate / necessary to support a more ambitious target in Policy SC2 which reflects current thinking, the findings of the Committee on Climate Change’s report (Net Zero – The UK’s contribution to stopping global warming) and the IPCC’s latest evidence on climate change. Need to look at the feasibility of introducing a carbon reduction target, what this might mean for new development and the impact on viability.</p> <p>SC5 could seek to limit occurrences of upslope development.</p> <p>Where GI elements are protected and enhanced through SC6, the Council could potentially encourage development proposals to consider how the carbon sink capacity of these elements would be impacted by development and show how this capacity would be preserved or increased by the development.</p>
Sub Area Policies	<p>Sub-area policies could seek to ensure that in each sub-area the local GI network is strategically managed and located in a way that helps to mitigate air pollution arising from key sources, such as strategic roads.</p> <p>Sub-area policies could seek to ensure that development on greenfield sites incorporates extensive GI and open space and that, overall in each sub-area over the Plan period, there is a net increase in tree canopy cover in order to maximise the significant environmental, economic and social benefits tree cover provides.</p> <p>Given the potential flood risk present in some parts of the sub-areas, Sub-area policies could seek to ensure upslope greenfield &amp; GI is protected from development &amp; for the GI network to be managed to reduce flood risk.</p> <p>Sub-area policies, particularly AD1, WD1 and PN1, could seek to ensure development is directed away from BMV soils.</p>
Planning for Place: Economy	<p>Economy policies could seek to require new employment land proposals to ensure that the development is highly accessible via walking and cycling and that safe storage for bicycles is provided for.</p> <p>When assessing the sustainability of proposals as a part of economy policies, the Council could consider impacts on land and soil resource. Proposals could be required to adopt best practice measures for soil management during construction and for excavated soil and rock to be reused either as part of the development or elsewhere.</p> <p>Economy policies could seek to make reference to circular economy principles and to encouraging enterprises that adopt these</p>
Planning for Place:	<p>In addition to residential areas and biodiversity sites, TR6 could include a requirement to protect and enhance character wherever new or enhanced transport infrastructure is proposed,</p>

Policy theme	Summary of recommendations
Transport	<p>particularly in rural areas.</p> <p>The transport policies could seek to ensure that cycle routes are separate from spaces used by cars and pedestrians in order to improve safety and appeal.</p> <p>The transport policies could seek to ensure that public transport infrastructure, such as hubs/interchanges and bus stops, are safe, well lit, facilitate natural surveillance and attractive spaces to be in so as to enhance their appeal.</p>
Planning for People: Housing	<p>HO6 could potentially encourage an even more ambitious target for using PDL, although it is appreciated that there is a need for development to be viable and achievable.</p>
Planning for Place: Environment	<p>The Council could consider encouraging development proposals to show how the carbon sink capacity of local green infrastructure, including trees, grasses and soils, would be protected and enhanced following development.</p> <p>The Council could consider whether to commission evidence on the renewable energy capacity of the district and suitable areas for renewable energy developments. If such evidence is made available Policy EN6 could be updated to include specific generation targets. The evidence could also be used in a separate policy in the Allocations DPD to identify suitable areas for renewable energy development and show these on the Policies Map.</p> <p>EN7 includes an aspiration of managing and reducing impacts of flooding within the Beck corridors in a manner that enhances their value for wildlife. This could be expanded to all river corridors &amp; riparian habitats in Bradford in order to enhance their biodiversity value whilst also enhancing the natural provision of a flood risk alleviation service, particularly for river corridors upslope.</p> <p>EN7 could include specific reference to the need to enhance biodiversity value along all river corridors and not just along the Beck, not only for the biodiversity value or flood risk alleviation service this provides but also for the water quality improvements it can deliver.</p> <p>EN2a could include additional wording to indicate that benefits would have an overriding public interest with regards to benefits that outweigh the protection of designated sites.</p> <p>EN5 could seek to ensure there is a net increase in total tree canopy in Bradford and that trees, hedgerows and woodland are all joined together in one coherent network.</p>
Planning for Place: Minerals	<p>The extraction of fossil fuels is incompatible with the transition towards a low-carbon society and economy. The mineral policies EN11 could seek to include more stringent criteria for proposals for new coal, oil or gas extraction to conform with in order to keep fossil fuels in the ground as much as possible. The NPPF (para. 205) refers to the need to 'ensure that there are no unacceptable adverse impacts on the natural and historic environment'. In line with the climate change emergency recently declared in Bradford, the Council could consider that any future extraction of coal, oil or gas would inevitably result in unacceptable adverse impacts on the climate and could thus seek to prevent any future extraction.</p> <p>The mineral policies could require proposals for new or expanded extraction sites to include innovative, significant and long-term efforts to remediate extraction sites and re-establish natural carbon sinks.</p> <p>The mineral policies could seek to prevent future occurrences of new open-cast mines in the District.</p> <p>Fully exhausted quarrying/mining sites should be reclaimed in a manner that enhances the site's flood risk alleviation value, such as new woodland or wetland features that capture excess surface water runoff.</p> <p>The mineral policies could require proposals for improved or new extraction sites to adopt strict water efficiency measures and to provide evidence to the Council on their expected water consumption versus the local capacity.</p>

Policy theme	Summary of recommendations
	<p>In line with the Water Framework Directive, the mineral policies could require proposals for improved or new extraction sites to adopt industry leading measures that reduce the risk of dust or other pollutants entering surface or groundwaters, and, if unable to show that the ecological or chemical status of nearby waters would not be protected or enhanced, should not be granted approval.</p> <p>The mineral policies could require proposals for improved or new extraction sites to preserve the presence of vegetation as much as is feasible. Whilst the extraction site is ‘active’, any habitat lost or damaged could be compensated for with the delivery of new habitat of similar size and quality at a nearby location and appropriately protected, at least until the extraction site undergoes reclamation. Proposals could be required to show how reclamation will achieve a net gain for biodiversity prior to being granted permission, such as by exhausted mines being converted into nature reserves.</p> <p>Proposals for new or expanded extraction sites could be required to show air pollution from extraction and transportation will impact air quality in Bradford and how this will be avoided and mitigated to protect the health of local people. This could include analyses of the impact of new/improved sites on HGV movements and the implications of new HGV movements on local congestion and air quality.</p>
<p>Planning for Place: Waste Management</p>	<p>Waste management policies could seek out opportunities for using renewable energies to power waste management facilities and for transitioning towards a low emission waste transportation vehicle fleet.</p>
<p>Planning for Place: Design</p>	<p>Design policies could encourage all new development to facilitate renewable energy generation, such as south-facing roofs for solar panels.</p> <p>New residential development could factor in opportunities for community composting schemes.</p> <p>DS2 or DS3 could specifically seek to ensure that development proposals upslope increase the GI cover and minimise replacing greenfield land with hard standing in order to minimise flood risk alterations.</p> <p>The design policies could place greater emphasis on the need for GI incorporated into developments to be comprised of a diverse range of native species connected to a wider ecological network.</p> <p>Design policies could potentially make specific reference to the particular design standards required for any proposals near the Saltaire World Heritage Site.</p> <p>Design policies could seek to ensure that all new development is accessible via attractive, safe and convenient walking and cycling routes (cycling routes would preferable be separate from the spaces used by cars and pedestrians) and that these routes connect new homes to public transport hubs as well as key services, community spaces and cultural and recreational areas.</p>

## **4.6 B6: Monitoring**

In order to ensure that effects of the CSPR arise as predicted, and that avoidance, mitigation or enhancement measures are successfully adopted, and work as planned, it is necessary for the Plan-makers to adopt and pursue a monitoring scheme. The SA will propose a monitoring framework to accompany the Regulation 19 consultation on the submission version of the CSPR. It is not possible to prepare this framework at this stage given the uncertainty over the final contents of the CSPR. It is expected that the monitoring and reporting will be carried out by the Council, likely incorporated into existing monitoring commitments such as the Authority Monitoring Report (AMR).

## 5 Next steps

### 5.1 Stage B: Development Alternatives and Assessing Effects

The SA process accompanying the preparation of the CSPR completed the SA Scoping (Stage A) in April 2019. This Interim Draft SA Report is a component of Stage B of the SA process as well as an early version of the SA Report required in Stage C and is intended to accompany the 2019 Regulation 18 consultation on the CSPR. Following Regulation 18 consultation, options for the CSPR will be further refined and defined concluding with the publication version of the CSPR ready for Regulation 19 consultation. The SA will continue to assist with the refining and defining of options by predicting and evaluating the sustainability impacts of options, alternatives and providing recommendations in an iterative process with the Council.

Following the Regulation 19 consultation, it is expected that the CSPR will be amended in light of stakeholder responses and then submitted to the Secretary of State (SoS) for the Ministry of Housing, Communities and Local Government for the examination process. The Draft SA will also be updated in light of stakeholder responses received as well as any changes made to the CSPR culminating in the SA Report required by Stage C of the SA process. The CSPR and its supporting evidence, including the SA Report, will be examined in public led by an Independent Inspector appointed by the SoS.

### 5.2 Stage C: Prepare Sustainability Appraisal Report

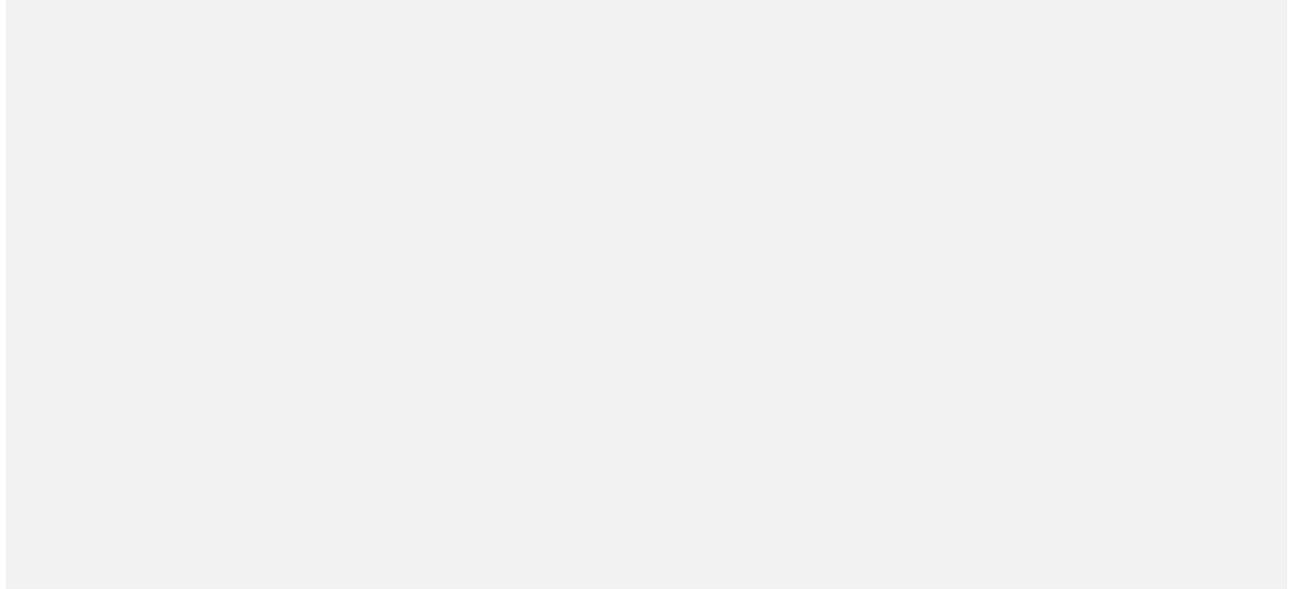
This is an Interim Draft Report to accompany Regulation 18 consultation on the CSPR. This will be refined and defined to become the SA Report accompanying Regulation 19 Consultation on the CSPR. Following this, the SA Report will be updated in line with stakeholder responses received during consultation as well as any changes made to the CSPR. The SA Report will then accompany submission of the CSPR to the SoS for Examination.

It is necessary for the final SA Report to satisfy the requirements of an ‘environmental report’ as per the SEA Directive. The requirements for an ‘environmental report’ are outlined in Article 5, and Annex 1, of the SEA Directive, as per the below.

#### **Art 5, SEA Directive:**

##### *“Environmental report*

*1. Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I. 2. The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. 3. Relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision-making or through other Community legislation may be used for providing the information referred to in Annex I. 4. The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.”*



### **5.3 Stage D: Consultation on Sustainability Appraisal Report**

The SA of the CSPR is expected to be consulted on a number of times, including (as a minimum) the consultation on the SA Scoping report that concluded in 2019; the Regulation 18 consultation on the CSPR; and the Regulation 19 consultation on the CSPR. Stakeholders consulted on include, as a minimum, the general public, the statutory bodies of Natural England, Historic England and the Environment Agency, as well as other relevant bodies the Council sees value in consulting. Following each round of consultation, responses received from stakeholders are closely reviewed and the SA Report is amended as appropriate. The responses that are received relevant to the SA are included in the appendices of the SA Reports alongside a summary of how and why the SA Report has been, or has not been, amended as a result.

Responses received during consultation on the SA Scoping report and a summary of how and why the SA Report has been, or has not been, amended as a result of each comment is provided in Appendix D.

Each round of consultation on the SA Report is a component of Stage D of the SA Process. Each round would also be expected to lead to some changes to the CSPR as a result of stakeholder feedback and the SA Report will be updated and amended to reflect these changes.

### **5.4 Stage E: Reporting and Monitoring**

Monitoring, and reporting on the monitoring process, is an essential element of SA to ensure that the effects of the CSPR, as well as the efficacy of adopted mitigation or avoidance measures, conform with the predictions and evaluations in SA. It is expected that the monitoring and reporting will be carried out by the Council, likely incorporated into existing monitoring commitments such as the Authority Monitoring Report (AMR). Should unanticipated effects may be identified, the proactive monitoring and reporting approach enables the Council to take appropriate remedial actions.

The next stages in the SA, along with the next stages in the CSPR, are summarised in Figure 5-1.

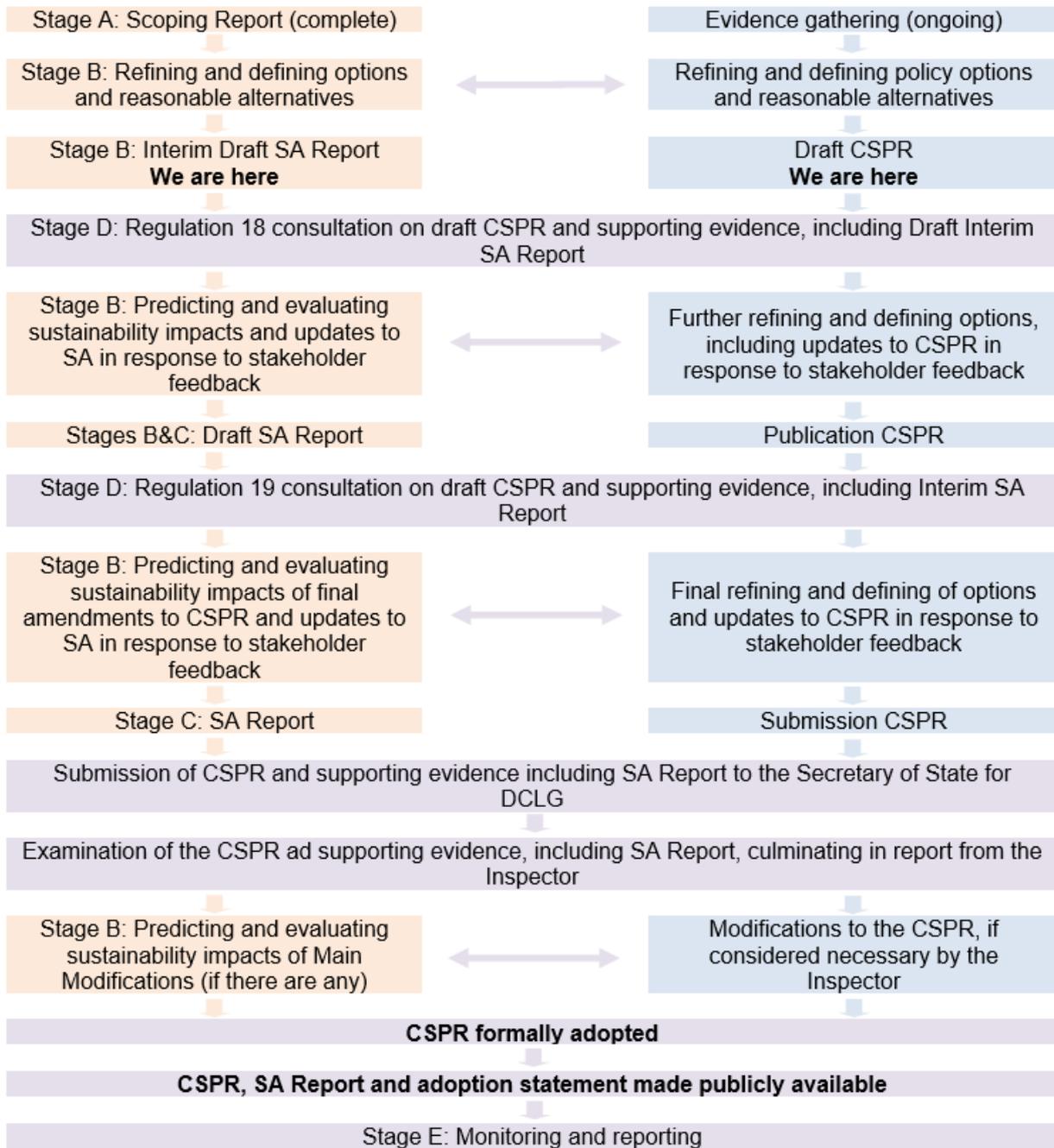


Figure 5-1: Current and next stages of the SA and CSPR. At all stages there is a high degree of iteration and cooperation between the SA and plan-making processes.

# APPENDIX A

## Summary of the PPP Review

As part of Stage A, the Scoping stage, of the SA process, a review of plans, policies and programmes (PPPs) was carried out to identify key objectives, messages, targets and indicators relevant to the Bradford Local Plan and its SA. results of this process is presented in **Table A.1**.

Table A.1: Summary of PPP review

Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
INTERNATIONAL POLICIES		
<p>SEA Directive 2001 Directive 2001/42/EC Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development</p>	<p>The Directive must be applied to plans or programmes whose formal preparation begins after 21 July 2004 and to those already in preparation by that date.</p>	<p>Requirements of the Directive must be met in Sustainability Appraisals. Allocate sites and develop policies that comply with the requirements of the Directive as well as more detailed policies derived from the Directive at the national level.</p>
<p>World Commission on Environment and Development (1987) Our Common Future (The Brundtland Report) The Brundtland Report is concerned with the world’s economy and its environment. The objective is to provide an expanding and sustainable economy while protecting a sustainable environment. The Report was in response to a call by the United Nations which sought: To propose long-term environmental strategies for achieving sustainable development by the year 2000 and beyond; To recommend ways in which the environment may be translated into greater co-operation among countries of the global South and between countries at different stages of economic and social development and lead to the achievement of common and mutually supportive objectives that take account of the interrelationships between people, resources, environment and development; To consider ways and means by which the international community can deal more effectively with environmental concerns; To help define shared perceptions of long-term environmental issues and the appropriate efforts needed to deal successfully with the problems of protecting and enhancing the environment, a long term agenda for action during the coming decades, and aspirational goals for the world community.</p>	<p>The report issued a multitude of recommendations with the aim of attaining sustainable development and addressing the problems posed by a global economy that is intertwined with the environment.</p>	<p>The Brundtland Report provided the original definition of sustainable development. The accumulated effects of the SA objectives seek to achieve sustainable development. Sustainable development is a central feature of the National Planning Policy Framework.</p>
<p>Kyoto Protocol on Climate Change (1997) and 2015 Paris Climate Change Agreement The Kyoto Protocol is an international agreement linked to the United Nations</p>	<p>Under the Kyoto Protocol (1997), the UK committed to reduce its greenhouse gas emissions to 12.5% below 1990 levels by 2008-2012, and to achieve a 20% reduction in CO2 emissions</p>	<p>Policy(s) relating to climate change should seek to reduce the emission of greenhouse gases and ensure that the effects of</p>

Appendix A – Summary of the PPP Review

Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>Framework Convention on Climate Change. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialised countries and the European community for reducing greenhouse gas emissions .These amount to an average of five per cent against 1990 levels over the five-year period 2008-2012.</p> <p>The Kyoto Protocol is influential to achieving sustainable development as it encourages transition to a low carbon economy. Therefore it is an integral factor in planning documents.</p>	<p>below 1990 levels by 2010.</p> <p>The Protocol was a precursor to the 2015 Paris Climate Change Agreement under which virtually every country, including all major carbon-emitting economies, pledged to constrain their greenhouse gas emissions, with the aim of keeping global warming well below two degrees Celsius. Governments also agreed measures to help poor nations protect themselves against climate impacts, and the outline of a system for monitoring and verifying countries’ compliance with their pledges.</p>	<p>climate change are taken into account.</p> <p>The SA should take into consideration the targets of the Kyoto Protocol and SA objectives / decision making criteria relating to reducing the emission of greenhouse gases should be included within the SA framework.</p>
<p>Johannesburg Declaration on Sustainable Development (United Nations, 2002)</p> <p>The World Summit on Sustainable Development proposed broad scale principles which should underlie sustainable development and growth. It includes objectives such as:</p> <p>Greater resource efficiency (including decoupling economic growth from environmental degradation);</p> <p>Support business innovation and take-up of best practice in technology and management;</p> <p>New technology development; and</p> <p>Technology demonstration and risk limitation.</p>	<p>There are a number of follow up processes (e.g. “significantly” reduce rate of loss of biodiversity by 2010, but no specific targets.</p>	<p>The plan should take account of the underlying sustainable development principles and seek to reflect these in policies.</p> <p>The SA should include objectives / decision making criteria that reflect the principles and objectives arising from the World Summit</p>
<p>Aarhus Convention (United Nations Economic Commission for Europe, 2001)</p> <p>The Aarhus Convention creates obligations in three fields or 'pillars':</p> <p>Public access to environmental information;</p> <p>Public participation in decision-making on matters related to the environment; and</p> <p>Access to justice (i.e. administrative or judicial review proceedings) in environmental matters.</p>	<p>No target or indicators.</p> <p>It lays down a set of basic rules to promote the involvement of citizens in environmental matters and improve enforcement of environmental law. It does include specific targets or indicators but there is a compliance committee which reviews compliance with the Convention.</p>	<p>The Council should ensure that the public are given adequate opportunity to contribute towards, and participate in the decision making process for the local plan documents. All local plan documents to be made publicly available.</p> <p>Consultation on the SA should be undertaken in accordance with SA / SEA regulations, giving both statutory consultees and the public opportunities to comment on the SA.</p>
<p>The Convention on Biological Diversity, Rio de Janeiro (1992)</p> <p>The main driver of the SEA Directive.</p> <p>Article 6a requires each Contracting Party to develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity.</p>	<p>Ensure that the plan does not Support development that threatens designated biodiversity sites.</p>	<p>SA should consider biodiversity impacts within its objectives. It should take a holistic view of ecosystems rather than a focusing on islands of protected species.</p>
<p>World Health Organisation Guideline Values (World Health Organisation, 1996)</p> <p>The World Health Organisation sets guideline values for healthy noise levels.</p>	<p>Between 23.00 and 07.00 hours, noise levels should not exceed 30 dB LAeq to allow undisturbed sleep. Outdoor noise levels of 50 dB should not be exceeded between 07.00 and 23.00, in order to prevent people being ‘moderately annoyed’.</p>	<p>The plan should take into consideration the guidelines on healthy noise levels.</p>

Appendix A – Summary of the PPP Review

Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>UNESCO World Heritage Convention Convention Concerning the protection of the world’s cultural and natural heritage.</p>	<p>Noting that the cultural heritage and the natural heritage are increasingly threatened with destruction not only by the traditional causes of decay, but also by changing social and economic conditions which aggravate the situation with even more formidable phenomena of damage or destruction. Deterioration or disappearance of any item of the cultural or natural heritage constitutes a harmful impoverishment of the heritage of all the nations of the world. It is essential for this purpose to adopt new provisions in the form of a convention establishing an effective system of collective protection of the cultural and natural heritage of outstanding universal value, organized on a permanent basis and in accordance with modern scientific methods,</p>	<p>CSPR and Site Allocations DPD should conform with the requirements of the UNESCO World Heritage Convention, particularly with the World Heritage Site Saltaire Village.</p>
<b>EUROPEAN POLICIES</b>		
<p>European Spatial Development Perspective (1999) European cultural landscapes, cities and towns, as well as a variety of natural and historic monuments are part of the European heritage. Its fostering should be an important part of modern architecture, urban and landscape planning in all regions of the European Union. A big challenge for spatial development policy is to contribute to the objectives, announced by the European Union during international conferences concerning the environment and climate, of reducing emissions into the global ecological system.</p>	<p>No specific target or indicators. The key indicator for assessing this policy is ‘Land take’. It looks at the change in the amount of agricultural, forest and other semi-natural and natural land taken by urban and other artificial land development. The drivers of land take are extensions of: housing, services and recreation; industrial and commercial sites; transport networks and infrastructure; mines, quarries and waste sites. There are no quantitative targets for land take for urban development at the European level.</p>	<p>Local plan should support the goals of the Spatial Development Perspective and seek to incorporate these in the policy framework. The SA should take account of the goals of the Spatial Development Perspective and SA objectives / decision making criteria relating to protecting cultural heritage, biodiversity and landscape character, and reducing climate change impacts should be included within the SA framework.</p>
<p>European Biodiversity Strategy to 2020 (COM(2011) 244) Protect species and habitats Maintain and restore ecosystems Achieve more sustainable agriculture and forestry Making fishing more sustainable and seas healthier Combat invasive alien species Help stop the loss of global biodiversity</p>	<p>By 2020, the assessments of species and habitats protected by EU nature law show better conservation or a secure status for 100% more habitats and 50% more species By 2020, ecosystems and their services are maintained and enhanced by establishing green infrastructure and restoring at least 15% of degraded ecosystems.</p>	<p>Local Plan should include a policy / policies relating to biodiversity, which seek to ensure its protection and enhancement. The SA should take into consideration the main themes of the Biodiversity Strategy and seek to reflect these in the SA objectives / decision making criteria.</p>
<p>European Commission White Paper on the European Transport Policy (European Commission, 2001) The White Paper on European Transport Policy proposes the following principal measures:</p>	<p>No target or indicators.</p>	<p>Local Plan should include policy(s) / relating to the provision of a safe and reliable sustainable transport network, taking into consideration the White Paper</p>

Appendix A – Summary of the PPP Review

Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>Revitalising the railways;            Improving quality in the road transport sector;            Striking a balance between growth in air transport and the environment;            Turning inter-modality into reality;            Improving road safety;            Adopting a policy on effective charging for transport;            Recognising the rights and obligations of users;            Developing high quality urban transport; and            Developing medium and long-term environmental objectives for a sustainable transport system.</p>		<p>measures.            The SA should take into consideration the White Paper measures and SA objectives /decision making criteria relating to the provision of high quality, integrated and sustainable transport systems, and improving road safety should be included within the SA framework.</p>
<p>European Commission Air Quality Framework Directive 96/62/EC (European Commission, 1996)            The Air Quality Framework Directive sets a framework for the monitoring and reporting of ambient levels of air pollutants.</p>	<p>The Directive includes mandatory limits or reductions for 11 air pollutants including: sulphur dioxide, nitrogen dioxide, particulate matter, lead, ozone, benzene, carbon monoxide, poly-aromatic hydrocarbons, cadmium, arsenic, nickel and mercury.</p>	<p>Local Plan should include a policy relating to air quality, which reflects the requirements of the Directive.            The SA should take into consideration the aim of the Directive and SA objectives / decision making criteria relating to reducing the emission of air pollutants and improving air quality should be included within the SA framework.</p>
<p>Environment 2010: Our Future, Our Choice (EU Sixth Environment Action Programme) (European Commission, 2001)            The latest Environment Action Programme gives a strategic direction to the Commission’s environmental policy over the next decade, as the Community prepares to expand its boundaries. The new programme identifies four environmental areas to be tackled for improvement:            Climate change;            Nature and biodiversity;            Environment, health and quality of life; and            Natural resources and waste.</p>	<p>No target or indicators.</p>	<p>Local Plan should include policies relating to the four environmental areas highlighted in the Environment Action Programme.            The SA should take into consideration the outcomes of the Environment Action Programme and SA objectives / decision making criteria relating to climate change, biodiversity, health and quality of life, natural resources and waste should be included within the SA framework.</p>
<p>Directive on the assessment of the effects of certain plans and programmes on the environment (2001/42/EC), EU (2001)            The SA Directive adopted in 2001 specifically requires the consideration of “the likely significant effects on the environment, including on issues such as ..., human health,” (European Parliament and the Council of the European Union, 2001). The SA Protocol (United Nations Economic Commission for Europe, 2003) implements the political commitments made at the Third European Conference on Environment and Health and uses the term ‘environment and health’ throughout. It indicates that health authorities should be consulted at the</p>	<p>No target or indicators.</p>	<p>The SA should take into consideration this directive.</p>

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<p>different stages of the process and so goes further than the SA Directive. Once ratified, it will require changes to the SA Directive to require that health authorities are statutory consultees.</p>		
<p>A Resource-Efficient Europe – Flagship Initiative Under the Europe 2020 Strategy Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions (COM 2011/21)</p> <p>This flagship initiative aims to create a framework for policies to support the shift towards a resource-efficient and low-carbon economy which will help to:</p> <ul style="list-style-type: none"> <li>boost economic performance while reducing resource use;</li> <li>identify and create new opportunities for economic growth and greater innovation and boost the EU's competitiveness;</li> <li>ensure security of supply of essential resources; and</li> <li>fight against climate change and limit the environmental impacts of resource use.</li> </ul>	<p>No target or indicators.</p>	<p>Local Plan should include policies which seek encourage resource efficiency and a low carbon economy.</p>
<p>European 7th Environmental Action Programme to 2020: Living well, within the limits of our planet (November 2013)</p> <p>The programme lists nine priority objectives and what the EU needs to do to achieve them by 2020. They are:</p> <ul style="list-style-type: none"> <li>to protect, conserve and enhance the Union's natural capital</li> <li>to turn the Union into a resource-efficient, green, and competitive low-carbon economy</li> <li>to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing</li> <li>to maximise the benefits of the Union's environment legislation by improving implementation</li> <li>to increase knowledge about the environment and widen the evidence base for policy</li> <li>to secure investment for environment and climate policy and account for the environmental costs of any societal activities</li> <li>to better integrate environmental concerns into other policy areas and ensure coherence when creating new policy</li> <li>to make the Union's cities more sustainable</li> <li>to help the Union address international environmental and climate challenges more effectively</li> </ul>	<p>No target or indicators.</p>	<p>Local Plan should include policies which seek encourage resource efficiency and a low carbon economy.</p>
<p>European Water Framework Directive (2000/60/EC)</p> <p>The Water Framework Directive establishes a framework for the protection of inland surface waters, transitional waters, coastal water and groundwater. It also encourages the sustainable use of water resources. The Directive has the following key aims:</p>	<p>The Directive requires all Member States to achieve 'good ecological status' of inland water bodies by 2015, and limits the quantity of groundwater abstraction to that portion of overall recharge not needed by ecology.</p>	<p>Local Plan should include a policy that ensures the protection of ground and surface waters, reflecting the aims of the Water Framework Directive.</p> <p>The SA should take into consideration the</p>

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<p>Expanding the scope of water protection to all waters, surface waters and groundwater;                      Achieving "good status" for all waters by a set deadline;                      Water management based on river basins;                      "Combined approach" of emission limit values and quality standards;                      Getting the prices right;                      Getting the citizen involved more closely; and                      Streamlining legislation.</p>		<p>aims of the Water Framework Directive and SA objectives / decision making criteria relating to protecting ground and surface water from pollution, enhancing water quality and ensuring the sustainable use of water resources should be included within the SA framework.</p>
<p>European Waste Framework Directive (2008/98/EC)                      Sets the basic concepts and definitions related to waste management. The Directive lays down some basic waste management principles: it requires that waste be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest</p>	<p>It incorporates provisions on hazardous waste and waste oils, and includes two new recycling and recovery targets to be achieved by 2020: 50% preparing for re-use and recycling of certain waste materials from households and other origins similar to households, and 70% preparing for re-use, recycling and other recovery of construction and demolition waste</p>	<p>SA process and therefore the Local Plan Review should seek to minimise waste, and the environmental effects caused by it. Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include sustainability objectives that minimise waste production as well as promote recycling.</p>
<p>European Habitats Directive (92/43/EEC)                      The Habitats Directive provides for the creation of a network of protected areas across the European Union to be known as 'Natura 2000' sites. This network includes SACs and SPAs. Member states should maintain or restore in a favourable condition these designated natural habitat types. If a project compromising one of these habitats must proceed in spite of negative conservation impacts due to it being in the public interest, compensatory measures must be provided for. Linear structures such as rivers/streams, hedgerows, field boundaries, ponds, etc., that enable movement and migration of species should be preserved.</p>	<p>No target or indicators.</p>	<p>Local Plan should include a policy which reflects the requirements of the Habitats Directive – the policy should afford protection to Natura 2000 sites and highlight the requirement to undertake HRA.                      The SA should take into consideration the aims of the Habitats Directive and an SA objective / decision making criteria relating to the protection of Natura 2000 sites should be included within the SA framework.</p>
<p>European Directive on the conservation of Wild Birds (2009/147/EC ) (codified version)                      The maintenance of the populations of all wild bird species across their natural range with the encouragement of various activities to that end.                      The identification and classification of Special Protection Areas (SPAs) for rare or vulnerable species, as well as all regularly occurring migratory species                      The establishment of a general scheme of protection for all wild birds</p>	<p>No target or indicators.</p>	<p>SA should seek to protect and enhance wild bird populations, including the protection of SPAs.</p>
<p>European Directive on Ambient Air Quality (2008/50/EC)</p>	<p>No targets or indicators.</p>	<p>Develop policies that meet standards of air</p>

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<p>The 2008 ambient air quality directive (2008/50/EC) sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). As well as having direct effects, these pollutants can combine in the atmosphere to form ozone, a harmful air pollutant (and potent greenhouse gas) which can be transported great distances by weather systems.</p>	<p>Key elements include:                      New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives—exposure concentration obligation and exposure reduction target                      The possibility to discount natural sources of pollution when assessing compliance against limit values                      The possibility for time extensions of three years (PM10) or up to five years (NO2 , benzene) for complying with limit values, based on conditions and the assessment by the European Commission.</p>	<p>quality.</p> <p>SA should consider the maintenance of good air quality and the measures that can be taken to improve it through, for example, an encouragement to reduce vehicle movements.</p>
<p>European Directive on Renewable Energy (2009/28/EC)                      The Renewable Energy Directive establishes an overall policy for the production and promotion of energy from renewable sources in the EU.</p>	<p>It requires the EU to fulfil at least 20% of its total energy needs with renewables by 2020 – to be achieved through the attainment of individual national targets. All EU countries must also ensure that at least 10% of their transport fuels come from renewable sources by 2020.                      On 30 November 2016, the Commission published a proposal for a revised Renewable Energy Directive recommending that the target of at least 27% renewables in the final energy consumption in the EU by 2030 is met.</p>	<p>The need to ensure that energy efficiency forms part of the mitigation strategy to reduce the impact of climate change upon the environment.</p>
<p>Waste Framework Directive (2008/98/EC)                      The Waste Framework Directive requires Member States to establish a network of disposal facilities and competent authorities with responsibility for issuing waste management authorisations and licenses. Member States may also introduce regulations which specify which waste recovery operations and businesses are exempt from the licensing regimes and the conditions for those exemptions.                      An important objective of the Waste Framework Directive is to ensure the recovery of waste or its disposal without endangering human health and the environment. Greater emphasis is also placed on the prevention, reduction, re-use and recycling of waste.                      Article 4 states that Member States shall take the necessary measures to ensure that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment, and in particular: without risk to water, air, soil and plants and animals; without causing a nuisance through noise or odours; and without adversely affecting the countryside or places of special interest.</p>	<p>No specific target or indicators relating to Local Plan policies. Targets relate to minimum weights of waste to be recycled by 2020.</p>	<p>Policy(s) for sustainable waste management should place emphasis on the prevention, reduction, re-use and recycling of waste, and seek to ensure no adverse environmental or social impacts arise from waste management.                      The SA should take into consideration the Waste Framework Directive and SA objectives / decision making criteria that promote the management of waste in accordance with the waste hierarchy should be included</p>
<p>European Directive on Urban Wastewater Treatment (9/271/EEC)                      Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors</p>	<p>No specific target or indicators relating to Local Plan policies</p>	<p>The plan should take account of the underlying sustainable development principles and seek to reflect these in</p>

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		<p>policies. The SA should include objectives / decision making criteria that reflect the principles and objectives arising from the Directive.</p>
<p>European Noise Directive (2002/49/EC) Preventing and reducing environmental noise where necessary and preserving environment noise quality where it is good.</p>	<p>No target or indicators. It is for Member states to consider the setting of targets and prescribed measures in their action plans.</p>	<p>The plan should take account of the underlying sustainable development principles and seek to reflect these in policies. The SA should include objectives / decision making criteria that reflect the principles and objectives arising from the Directive</p>
<p>European Landscape Convention (Florence Convention) (March 2017) The convention promotes landscape protection, management and planning.</p>	<p>No indicators or targets. Highlights the need to recognise landscape in law, to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies.</p>	<p>Ensure that site allocations and policies take account of the Convention. Include sustainability objectives to protect the archaeological heritage.</p>
<p>The Convention for the Protection of the Architectural Heritage of Europe (Valetta Convention) Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater. Creation of archaeological reserves and conservation of excavated sites.</p>	<p>No indicators or targets The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. Objectives include: The inventory and protection of sites and areas Promoting high standards for all archaeological work The creation of archaeological reserves The protection and recording of archaeology during development.</p>	<p>Ensure that site allocations and policies take account of the Convention. Include sustainability objectives to protect the archaeological heritage.</p>
<p>Energy Performance of Buildings Directive (2002/91/EC) Promotes the energy performance of buildings within the European Community, taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness. The main points of the directive are as follows: When buildings are advertised for sale or rent, energy performance certificates are to be included. Larger public buildings must display a Display Energy Certificate (DEC). Inspection schemes must be established for heating and air conditioning systems or measures put in place with equivalent effect. All new buildings must be nearly zero energy buildings by 31 December 2020 (public buildings by 31 December 2018). EU countries must set minimum energy performance requirements for new</p>	<p>The directive requires all new buildings to be nearly zero energy buildings by 31 December 2020</p>	<p>Ensure that site allocations and policies take account of the guidance of the directive. Include sustainability objectives to promote energy efficiency in building and related land use.</p>

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<p>buildings, for buildings that undergo major renovations and for the replacement or retrofit of building elements (heating and cooling systems, roofs, walls, etc.). EU countries have to draw up lists of national financial measures to improve the energy efficiency of buildings.</p>		
<p>European Union (EU) Strategy for Sustainable Development The European Union’s (EU) strategy for sustainable development, agreed at the 2001 Gothenburg Summit, amended in 2005 and reviewed in 2009, places a strong emphasis on seven key sustainability themes: Climate change and clean energy Sustainable transport Sustainable consumption and production Conservation and management of natural resources Public health Social inclusion, demography and migration Global poverty and sustainable development challenges</p>	<p>No target or indicators.</p>	<p>The SA framework should ensure the objectives of this overarching document are covered</p>
<p>European Strategy for Sustainable Development (2009) This strategy provides an EU-wide policy framework to deliver sustainable development, i.e. to meet the needs of the present without compromising the ability of future generations to meet their own needs.</p>	<p>Limit climate change and its effects by meeting commitments under Kyoto Protocol and under the framework of the European Strategy on Climate Change. Energy efficiency, renewable energy and transport will be the subject of particular efforts. Limiting the adverse effects of transport and reducing regional disparities and do more to develop transport that is environmentally friendly and conducive to health. To promote more sustainable modes of production and consumption with attention paid to how much ecosystems can tolerate. Sustainable management of natural resources in particular the EU must make efforts in agriculture, fisheries and forest management; see to it that the Natura 2000 network is completed; define and implement priority actions to protect biodiversity, and make sure that aspects associated with the seas and oceans are duly taken into account. Recycling and re-use must also be supported. Limiting major threats to public health. Social exclusion and poverty and mitigate the effects of an ageing society. The fight against global poverty.</p>	<p>These issues need to be incorporated into the SA appraisal process.</p>
<p>European Structural and Investment Funds Growth Programme 2014-2020 The European Structural and Investment Funds programme provides funds to</p>	<p>Running from 2014 to 2020, there are three types of funds involved in the programme.</p>	<p>A need to recognise of the direction of the strategy in terms of facilitating sustainable</p>

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<p>help local areas grow. The funds support investment in innovation, businesses, skills and employment and create jobs.</p>	<p>European Structural and Investment Funds (ESIF) focuses on improving the employment opportunities, promoting social inclusion and investing in skills by providing help to people who need support in fulfilling their potential. European Regional Development Fund (ERDF) supports research and innovation, small to medium sized enterprises and creation of a low carbon economy. European Agricultural Fund for Rural Development (EAFRD) supports rural businesses to grow and expand, improve knowledge and skills and get started.</p>	<p>economic growth</p>
<p>EU Seventh Environmental Action Programme of the European Community (2014) Identifies three key objectives: to protect, conserve and enhance the Union’s natural capital to turn the Union into a resource-efficient, green, and competitive low-carbon economy to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing</p>	<p>Four so called "enablers" will help Europe deliver on these goals: better implementation of legislation better information by improving the knowledge base more and wiser investment for environment and climate policy full integration of environmental requirements and considerations into other policies Two additional horizontal priority objectives complete the program: to make the Union's cities more sustainable to help the Union address international environmental and climate challenges more effectively.</p>	<p>Ensure that the Local Plan Review SA takes into account the objectives</p>
<p>Our Life Insurance, Our Natural Capital: An EU Biodiversity Strategy to 2020 (2011) This strategy is aimed at reversing biodiversity loss and speeding up the EU’s transition towards a resource efficient and green economy.</p>	<p>The EU 2020 biodiversity target is underpinned by the recognition that, in addition to its intrinsic value, biodiversity and the services it provides have significant economic value that is seldom captured in markets. Because it escapes pricing and is not reflected in society’s accounts, biodiversity often falls victim to competing claims on nature and its use. The 2020 headline target is: Halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as feasible, while stepping up the EU contribution to averting global biodiversity loss.</p>	<p>Ensuring that biodiversity forms part of the SA assessment and that biodiversity mitigation measures to reduce the impact of development on the environment are addressed.</p>
<p><b>NATIONAL POLICIES</b></p>		
<p>National Planning Policy Framework (2018) The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied. It replaces all previous planning policies set out in PPSs and PPGs. It sets out the Government’s requirements for the planning system only to the extent that it is</p>	<p>Relevant targets and indicators for different topic areas. The NPPF reiterates the need to be compliant with the SA regulations during the production of a Local Plan. The NPPF is also supportive by an extensive range of national planning policy guidance (NPPG) – noted below.</p>	<p>Local Plan making and all relevant Sustainability Appraisal process should comply with the NPPF. Sustainability Appraisal should be an integral part of the plan preparation</p>

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<p>relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.</p> <p>Presumption in favour of sustainable development. Delivering sustainable development by:</p> <ul style="list-style-type: none"> <li>Plan Making</li> <li>Decision Making</li> <li>Delivering a sufficient supply of homes</li> <li>Building a strong, competitive economy</li> <li>Ensuring the vitality of town centres</li> <li>Promoting healthy and safe communities</li> <li>Promoting sustainable transport</li> <li>Supporting high quality communications</li> <li>Making effective use of land</li> <li>Achieving well-designed places</li> <li>Protecting Green Belt land</li> <li>Meeting the challenge of climate change, flooding and coastal change</li> <li>Conserving and enhancing the natural environment</li> <li>Conserving and enhancing the historic environment</li> <li>Facilitating the sustainable use of minerals</li> </ul>		<p>process, and should consider all the likely significant effects on the environment, economic and social factors.</p> <p>Wide ranging implications for site allocations.</p>
<p>National Planning Practice Guidance (2014 onwards)</p> <p>Provides further guidance to be read alongside the NPPF on a range of topics that link to the promotion of sustainable development including:</p> <ul style="list-style-type: none"> <li>Air quality</li> <li>Climate change</li> <li>Conserving and enhancing the historic environment</li> <li>Flood risk</li> <li>Health and well being</li> <li>Housing and economic development</li> <li>Natural environment</li> <li>Minerals</li> <li>Rural housing</li> <li>Open space</li> <li>Transport</li> <li>Viability</li> <li>Waste</li> <li>Water supply, wastewater and water quality</li> </ul>	<p>No target or indicators.</p>	<p>Local Plan making and all relevant Sustainability Appraisal process should comply with the NPPG.</p> <p>Sustainability Appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.</p> <p>Wide ranging implications for site allocations.</p>
<p>Securing the Future: The UK Government Sustainable Development Strategy (Secretary of State for Environment, Food and Rural Affairs, March 2005)</p>	<p>For the UK Government Strategy, a set of 68 indicators have been established, consisting of the 20 UK Framework</p>	<p>Local Plan should take account of the guiding principles and the priority areas for</p>

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<p>The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.</p> <p>The Strategy includes the following guiding principles:</p> <p>Living Within Environmental Limits – respecting the limits of the planet’s environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations;</p> <p>Ensure a Strong, Healthy and Just Society - Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;</p> <p>Achieving a Sustainable Economy - Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised;</p> <p>Promoting Good Governance - Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy, and diversity; and</p> <p>Using Sound Science Responsibly - Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (the precautionary principle) as well as public attitudes and values.</p> <p>The Strategy lists four priority areas for immediate action:</p> <p>Sustainable production and consumption;</p> <p>Climate change and energy;</p> <p>Natural resource protection and environmental enhancement; and</p> <p>Sustainable communities.</p>	<p>Indicators and a further 48 indicators with which to monitor progress.</p>	<p>action and address these in the policy framework.</p> <p>The SA should take into account the guiding principles and priority areas for action in the Strategy and seek to reflect these in the SA objectives / decision making criteria.</p>
<p>Urban White Paper: Our Towns, Our Cities, The Future. Delivering an Urban Renaissance Department for the Environment, Transport and the Regions (DETR), November 2000</p> <p>The vision of the White Paper is ‘of towns, cities and suburbs that offer a high quality of life and opportunity for all, not just the few’. The aim is to see:</p> <p>People shaping the future of their community, supported by strong and truly representative local leaders;</p> <p>People living in attractive, well kept towns and cities which use space and buildings well;</p> <p>Good design and planning which makes it practical to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion;</p> <p>Towns and cities able to create and share prosperity, investing to help all their citizens reach their full potential; and</p>	<p>The national target is that by 2008, 60% of additional housing should be provided on previously developed land and through conversions of existing buildings. The White Paper also includes a national target for 17% of underused land to be reclaimed by 2010.</p>	<p>Local Plan should take account of the key aims of the Urban White Paper and seek to address the aims in the policy framework. The use of previously developed land and reuse of buildings should be promoted. However LPAs where setting targets for the delivery of housing on PDL, must take into account the scale and nature of available land supply, constraints on delivery and viability.</p> <p>The SA should take into consideration the proposals in the Urban White Paper and seek to reflect the aims of the White Paper</p>

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<p>Good quality services – health, education, housing, transport, finance, shopping, leisure and protection from crime – that meet the needs of people and businesses wherever they are.</p> <p>This urban renaissance will benefit everyone, making towns and cities vibrant and successful, and protecting the countryside from development pressure.</p>		<p>in the SA objectives / decision making criteria.</p>
<p>UK Biodiversity Action Plan (DoE, 1994) and UK Post 2010 Biodiversity Framework The UK BAP is the UK Government's response to the Convention on Biological Diversity signed in 1992. The BAP describes the UK's biological resources and includes a detailed plan for the protection of these resources, including a series of action plans for Priority Species and Habitats. UK Biodiversity Steering Group 1995 set a goal to 'conserve and enhance biological diversity within the UK and to contribute to the conservation of biodiversity through all appropriate mechanisms'. It should be noted that in 2008 there was a UK-wide Reporting Round for national and local BAPs, during which the Priority Species and Habitats were reviewed and the lists updated. The 'UK Post-2010 Biodiversity Framework', published in July 2012, succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach', and is the result of a change in strategic thinking following the publication of the CBD's 'Strategic Plan for Biodiversity 2011–2020' and its 20 'Aichi Biodiversity Targets', at Nagoya, Japan in October 2010, and the launch of the EU Biodiversity Strategy (EUBS) in May 2011. The Framework demonstrates how the work of the four countries and the UK contributes to achieving the Aichi Biodiversity Targets, and identifies the activities required to complement the country biodiversity strategies in achieving the targets<sup>19</sup>.</p>	<p>The UK Bap contained a list of 59 broad targets for the Government and its nature conservation agencies, in partnership with others, to conserve, and where practicable, to enhance wild species and wildlife habitats over the next 20 years.<sup>20</sup></p>	<p>Local Plan policy framework should ensure the protection, conservation and enhancement of biodiversity in line with the UK BAP. The SA should take into consideration the goal of the UK BAP and SA objectives / decision making criteria relating to the conservation and enhancement of species, habitats and wildlife networks should be included within the SA framework.</p>
<p>National Housing Standards 2015 The Government created an approach for the setting of technical standards for new housing as set out in 'The Ministerial statement' (25th March 2015). Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of an optional nationally described space standard and in relation to accessibility only.</p>	<p>The NDSS sets out minimum size standards for different dwellings in terms of numbers of bedrooms and numbers of storeys The Accessible Housing categories are: M4(2) Category 2: Accessible and adaptable dwellings is an optional Building Regulation, and as such would only apply where planning policy allows and when conditioned on a</p>	<p>Include SA objectives which promote sustainable development and seek to achieve higher levels of efficiency (e.g. in energy, water etc.) where appropriate.</p>

<sup>19</sup> Information from <http://jncc.defra.gov.uk/ukbap> - accessed 10/01/19

<sup>20</sup> <http://jncc.defra.gov.uk/ukbap> - accessed 10/01/19

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<p>Nationally Described Space Standard (NDSS). A single standard for minimum space requirements is set out by national guidance.</p> <p>Accessible Housing.</p> <p>In relation to accessible housing, national guidance states that if a LPA chooses to adopt standards in relation to accessible housing, then they can relate only to 2 categories, and a target percentage would need to be set for each category.;</p>	<p>planning application.</p> <p>M4(3) Category 3: Wheelchair user dwellings is an optional Building Regulation.</p>	
<p>The Natural Choice: Securing the Value of Nature (White Paper 2011)</p> <p>Outlines the Government’s vision for the natural environment over the next 50 years, backed up with practical action to deliver the ambition</p> <p>Four themes:</p> <p>Protecting and improving our natural environment</p> <p>Supporting Local Nature Partnerships, working at a strategic level to improve benefits and services from a healthy natural environment.</p> <p>Support establishing new Nature Improvement Areas based on local assessment of opportunities for restoring and connecting nature on a significant scale, including identifying within local plans.</p> <p>The planning system to deliver the homes, business, infrastructure and thriving local places while protecting and enhancing the natural and historic environment, through planning reform (NPPF).</p> <p>Introducing biodiversity off-setting, managed locally.</p> <p>Planning for low-carbon infrastructure</p> <p>Restoring the elements of our natural network (Protecting and improving woodlands and forests, restoring nature in rivers and water bodies, restoring nature in towns, cities and villages, including valuing green infrastructure for communities and managing environmental risks (flooding and heat waves)</p> <p>Growing a green economy</p> <p>Range of initiatives to encourage environmental benefits for business</p> <p>Reconnecting people and nature</p> <p>Local Nature Partnerships and Health and Wellbeing Boards work together in promoting the health benefits of the natural environment</p> <p>Promoting the natural environment in schools</p> <p>Improve access to nature in local neighbourhoods, including measures in the Localism Act (including neighbourhood plans)</p> <p>Improving access to the countryside</p> <p>International and EU leadership</p> <p>Number of key reforms including implementation of the Nagoya commitments on biodiversity</p>	<p>No specific targets or indicators.</p> <p>The monitoring section of this white paper indicates that a range of indicators will be established for biodiversity and other environmental issues.</p>	<p>The importance of nature not just for species but for people too needs to be considered in the SA including - awareness of possible new natural environment Designations, initiatives affecting potential site allocations and closer links between Greenspace accessibility and public health. Ensure that site allocations and policies will protect the intrinsic value of nature and recognise the multiple benefits it could have for communities.</p> <p>Include a sustainability objective relating to the enhancement of the natural environment.</p>
<p>Natural Environment and Rural Communities (NERC) Act 2006</p> <p>An Act to make provision about bodies concerned with the natural environment</p>	<p>Section 40 of the NERC Act places a duty to conserve biodiversity on public authorities in England. It requires local</p>	<p>The CSPR and Site Allocations should seek to conform with the requirements of the</p>

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and rural communities; to make provision in connection with wildlife, sites of special scientific interest, National Parks and the Broads; to amend the law relating to rights of way; to make provision as to the Inland Waterways Amenity Advisory Council; to provide for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.	authorities and government departments to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision-making. Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats which are regarded by Natural England to be of "principal importance" for the purposes of conserving biodiversity in England.	NERC Act.
National biodiversity climate change vulnerability model The National Biodiversity Climate Change Vulnerability Model (NBCCVM) aims to provide a spatially explicit assessment of the relative vulnerability of priority habitats based on established climate change adaptation principles. Climate change will exacerbate existing pressures on biodiversity and bring new challenges of its own. Adaptation to climate change is therefore a priority for conservation and environmental management.	This tool could be interrogated to identify where measures for enhancing adaptability to climate change are most needed in order to protect protected habitats.	The CSPR and Site Allocations DPD could seek to ensure that new policies and development to not inhibit the potential for future measures that protect habitats from the impacts of climate change.
Rights of Way Circular (1/09) Guidance for Local Authorities V. 2 October 2009 This circular gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.	Various recommendations in relation to managing, maintaining and changing the network including how to liaise with the public.	The CSPR and Site Allocations DPD should seek to adopt measures set out in the guidance for options that could impact on public rights of way (PRoW).
The Flood and Water Management Act 2010 The Flood and Water Management Act (FWMA) takes forward a number of recommendations from the Pitt Review into the 2007 floods. It places new responsibilities on the Environment Agency, local authorities and property developers (among others) to manage the risk of flooding.	Lead local flood authorities are responsible for local sources of flood risk, in particular from surface runoff, groundwater and ordinary watercourses. Local authorities are responsible for ensuring that new requirements for preliminary flood risk assessments and for approval of sustainable drainage systems are met.	Policies should seek to manage and improve flood risk across the District, and prevent development from being exposed to high levels of flood risk. Include SA objective which seeks to prevent inappropriate new development in high flood risk areas and ensure that new development does not cause flooding.
Water for Life (White Paper 2011) Water for Life describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is. It explains that we all have a part to play in the realisation of this vision.	No specific targets or indicators relating to Local Plan policies. The White Paper includes Ofwat targets for addressing leakage and demand.	Ensure that site allocations and policies will support the wise use of water, and improvement of water quality. Include sustainability objectives that relate to water quality and quantity.

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<p>Biodiversity 2020: A Strategy for England’s Wildlife and ecosystem services Mission: “to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people”. Sets out high level outcomes to 2020. Vision: “By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone”. Priority Action: Establish more coherent and resilient ecological networks on land that safeguard ecosystem services for the benefit of wildlife and people; Establish and effectively manage an ecologically coherent network of marine protected areas covering in excess of 25% of English waters by end of 2016; Take targeted action for recovery of priority species, whose conservation is not delivered through wider habitat-based and ecosystem measures; Ensure that ‘agricultural’ genetic diversity is conserved and enhanced wherever appropriate; Work with the biodiversity partnership to engage significantly more people in biodiversity issues; Promote taking better account of the values of biodiversity in public and private sector decision making, including providing tools to help consider a wider range of ecosystem services; Develop new and innovative financing mechanisms to direct more funding towards achievement of biodiversity outcomes.</p>	<p>Outcome 1 – Habitats and ecosystems on land (including freshwater environments) 1A. Better wildlife habitats with 90% of priority habitats in favourable or recovering condition and at least 50% of SSSIs in favourable condition, while maintaining at least 95% in favourable or recovering condition; 1B. More, bigger and less fragmented areas for wildlife, with no net loss to priority habitat and an increase in the overall extent of priority habitats by at least 200,000 ha; 1C. By 2020, at least 17% of land and inland water, especially areas of particular importance for biodiversity and ecosystem services including through management of our existing systems of protected areas and the establishment of nature improvement areas; 1D. Restoring at least 15% of degraded ecosystems as a contribution to climate change mitigation and adaptation. Outcome 2 – Marine habitats, ecosystems and fisheries; 2A. By the end of 2016 in excess of 25% of English waters will be contained in a well-managed Marine Protected Area network that helps deliver ecological coherence by conserving representative marine habitats; 2B. By 2020 we will be managing and harvesting fish sustainably; 2C. By 2022 we will have marine plans in place covering the whole of England’s marine area, ensuring the sustainable development of our seas, integrating economic growth, social need and ecosystem management. Outcome 3 - Species By 2020, an overall improvement in the status of wildlife and prevented further human-induced extinctions of known threatened species. Outcome 4 – People By 2020, significantly more people engaged in biodiversity issues, aware of its value and taking positive action.</p>	<p>Awareness of biodiversity value of land in assessment of potential site allocations.</p>
<p>A Green Future; Our 25 Year Plan to Improve the Environment DEFRA 2018 Broad long-range environmental plan covering a number of key environmental directions.</p>	<p>Sets out a wide range of goals and targets: Clean air We will achieve clean air by: Meeting legally binding targets to reduce emissions of five damaging air pollutants; this should halve the effects</p>	<p>Ambitions and targets will need to be reviewed as part of the CSPR and Site Allocations DPD.</p>

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	<p>of air pollution on health by 2030. Ending the sale of new conventional petrol and diesel cars and vans by 2040. Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework.</p> <p>Clean and plentiful water We will achieve clean and plentiful water by improving at least three quarters of our waters to be close to their natural state as soon as is practicable by: Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies. Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans. Supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025. Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters; we will make sure that potential bathers are warned of any short-term pollution risks.</p> <p>Thriving plants and wildlife We will achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife. At sea, we will do this by: Reversing the loss of marine biodiversity and, where practicable, restoring it. Increasing the proportion of protected and well-managed seas, and better managing existing protected sites. Making sure populations of key species are sustainable with appropriate age structures ensuring seafloor habitats are productive and sufficiently extensive to support healthy, sustainable ecosystems. On land and in freshwaters, we will do this by: restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition,</p>	

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	<p>securing their wildlife value for the long term.            Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits.            Taking action to recover threatened, iconic or economically important species of animals, plants and fungi, and where possible to prevent human induced extinction or loss of known threatened species in England and the Overseas Territories.            Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042.            Reducing the risks of harm from environmental hazards            We will reduce the risk of harm to people, the environment and the economy from natural hazards including flooding, drought and coastal erosion by:            Making sure everyone is able to access the information they need to assess any risks to their lives and livelihoods, health and prosperity posed by flooding and coastal erosion.            Bringing the public, private and third sectors together to work with communities and individuals to reduce the risk of harm.            Making sure that decisions on land use, including development, reflect the level of current and future flood risk.            Ensuring interruptions to water supplies are minimised during prolonged dry weather and drought.            Boosting the long-term resilience of our homes, businesses and infrastructure.            Using resources from nature more sustainably and efficiently            We will ensure that resources from nature, such as food, fish and timber, are used more sustainably and efficiently.            We will do this by:            Maximising the value and benefits we get from our resources, doubling resource productivity by 2050.            Improving our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches</p>	

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	<p>increasing timber supplies ensuring that all fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield ensuring that food is produced sustainably and profitably.</p> <p>Enhancing beauty, heritage and engagement with the natural environment</p> <p>We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone. We will do this by: safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage. Making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing.</p> <p>Focusing on increasing action to improve the environment from all sectors of society.</p> <p>Mitigating and adapting to climate change.</p> <p>We will take all possible action to mitigate climate change, while adapting to reduce its impact.</p> <p>We will do this by: Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century implementing a sustainable and effective second National Adaptation Programme</p> <p>Minimising waste</p> <p>We will minimise waste, reuse materials as much as we can and manage materials at the end of their life to minimise the impact on the environment. We will do this by:</p> <p>Working towards our ambition of zero avoidable waste by 2050.</p> <p>Working to a target of eliminating avoidable plastic waste</p>	

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	<p>by end of 2042.</p> <p>Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones.</p> <p>Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk.</p> <p>Delivering a substantial reduction in litter and littering behaviour.</p> <p>Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.</p> <p>Managing exposure to chemicals</p> <p>We will make sure that chemicals are safely used and managed, and that the levels of harmful chemicals entering the environment (including through agriculture) are significantly reduced. We will do this by:</p> <p>Seeking in particular to eliminate the use of Polychlorinated Biphenyls by 2025, in line with our commitments under the Stockholm Convention reducing land-based emissions of mercury to air and water by 50% by 2030.</p> <p>Substantially increasing the amount of Persistent Organic Pollutants material being destroyed or irreversibly transformed by 2030, to make sure there are negligible emissions to the environment fulfilling our commitments under the Stockholm Convention as outlined in the UK’s most recent National Implementation Plan</p> <p>Enhancing biosecurity</p> <p>We will enhance biosecurity to protect our wildlife and livestock, and boost the resilience of plants and trees. We will do this by:</p> <p>Managing and reducing the impact of existing plant and animal diseases; lowering the risk of new ones and tackling invasive non-native species.</p> <p>Reaching the detailed goals to be set out in the Tree</p>	

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	<p>Health Resilience Plan of 2018 Ensuring strong biosecurity protection at our borders, drawing on the opportunities leaving the EU provides. Working with industry to reduce the impact of endemic disease.</p>	
<p>Safeguarding our Soils: A Strategy for England 2011 Outlines the Government’s approach to safeguarding our soils for the long term. Provides a vision to guide future policy development across a range of areas and sets out the practical steps to be taken to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve our understanding of the threats to soil and best practice in responding to them</p>	<p>No specific targets or indicators. Makes reference to peat extraction targets.</p>	<p>Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations. Develop policies that promote brownfield / previously developed land sites for development where the land is not of high environmental value. Protection of important open spaces / land. Include SA objective which seeks to safeguard and enhance the quality of soil.</p>
<p>Planning &amp; Compulsory Purchase Act 2004 (as amended) The Planning and Compulsory Purchase Act 2004 is a key element of the Government’s agenda for speeding up the planning system. The provisions introduce powers which allow for the reform and speeding up of the plans system and an increase in the predictability of planning decisions, the speeding up of the handling of major infrastructure projects and the need for simplified planning zones to be identified in the strategic plan for a region.</p>	<p>Policies will need to take account of this Act.</p>	<p>Policies will need to take account of this Act.</p>
<p>Housing &amp; Planning Act 2016 An Act to make provision regarding housing, estate agents, rent air charges, planning and compulsory purchase. place a duty on local planning authorities to actively promote the development of Starter Homes and embed them in the planning system unlock brownfield land to provide homes faster, requiring local authorities to prepare, maintain and publish local registers of specified land support the doubling of the number of custom-built and self-built homes to 20,000 by 2020 ensure that every area has a Local Plan reform the compulsory purchase process to make it clearer, fairer and faster simplify and speed up neighbourhood planning</p>	<p>Policies will need to take account of this Act</p>	<p>Policies will need to take account of this Act</p>
<p>Localism Act (2011) The Localism Act 2011 introduced the requirement of local authorities to comply with the ‘Duty to Cooperate’ in the preparation of Development Plan Documents (the ‘local plan’). The purpose of this is to satisfy both legal compliance and</p>	<p>Policies will need to take account of this Act.</p>	<p>Ensure that the consultation process enables genuine opportunities for local people to be involved in the Local Plan process and to be part of planning</p>

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<p>soundness issues in plan making, to ensure that any ‘cross administrative boundary issues’ are addressed. The Localism Act also included provisions for the preparation of Neighbourhood Plan and once adopted, for these to form part of the statutory Development Plan for a local area.</p>		<p>decisions made in the areas affected. Ensure that evidence collected to support the SA and the Local Plan Review is locally derived, where applicable Sustainability objectives to be included with regard to social inclusion and communities.</p>
<p>Planning (Listed Buildings &amp; Conservation Areas) Act 1990 In addition to normal planning framework set out in the Town and Country Planning Act 1990:</p> <p>the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest</p> <p>the Ancient Monuments and Archaeological Areas Act 1979 provides specific protection for scheduled monuments</p>	<p>Protecting and enhancing the historic environment</p>	<p>Policies relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the development plan.</p>
<p>White Paper - Our Health, Our Care, Our Say: A New Direction for Community Services (Department for Health, January 2006) The Health White Paper sets the direction for the UK health and social care system. The vision is of a new strategic direction for all the care and support services that people use in their communities and neighbourhoods. There are three themes:</p> <p>Putting people more in control of their own health and care; Enabling and supporting health, independence and well being; and Rapid and convenient access to high quality, cost effective care.</p>	<p>No specific targets or indicators relating to Local Plan policies.</p>	<p>Local Plan should consider the key themes of the Health White Paper in the policy framework. The SA should take into consideration the Health White Paper key themes and an SA objective / decision making criteria relating to improving health and well being and ensuring access to quality healthcare should be included within the SA framework.</p>
<p>Climate Change the UK Programme, Secretary of State for the Environment, Food and Rural Affairs, March 2006 The UK Climate Change Programme sets out the policies and priorities for climate change action in the UK and internationally. The aim is to reduce dependence on fossil fuel and make a radical shift to more sustainable patterns of energy generation and consumption.</p>	<p>The UK Government have set a domestic goal to reduce carbon dioxide emissions by 20 per cent below 1990 levels by 2010 and by 60 per cent by 2050.</p>	<p>The Climate Change Programme policies and priorities for climate change action should be reflected in the Local Plan policy framework. The SA should take into consideration the policies and priorities of the Climate Change Programme and SA objectives / decision making criteria relating to energy supply and use, reducing greenhouse gas emissions, sustainable transport, and climate change adaptation should be included within the SA framework.</p>
<p>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)</p>	<p>Sets out a number of targets for different pollutants including:</p>	<p>Develop policies that meet standards of air</p>

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<p>The Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK in the long term. The Strategy sets out the air quality standards and objectives for concentrations of pollutants in England.</p>	<ul style="list-style-type: none"> <li>• Particles</li> <li>• NO2</li> <li>• Ozone</li> <li>• Sulphur dioxide</li> <li>• Benzene</li> <li>• Carbon monoxide</li> <li>• Lead</li> </ul>	<p>quality. Sustainability objectives that seek to improve air quality.</p>
<p>Planning Policy for Traveller Sites (2015) Government’s aims in respect of traveller sites are: That local planning authorities should make their own assessment of need for the purposes of planning To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites To encourage local planning authorities to plan for sites over a reasonable timescale That plan-making and decision-taking should protect Green Belt from inappropriate development To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply To reduce tensions between settled and traveller communities in plan-making and planning decisions To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. For local planning authorities to have due regard to the protection of local amenity and local environment</p>	<p>Policies will need to account of this policy.</p>	<p>Develop policies that address the requirements and ensure needs assessment is up to date. Sustainability objectives that relate to social inclusion and housing needs. Ensure that the relevant considerations are taken into account when allocating sites.</p>
<p>The National Adaptation Programme and Third Strategy for Climate Change Adaptation Report – Making the Country Resilient to a Changing Climate, July 2018 The report sets out visions for the following sectors: Natural Environment – “The natural environment with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change, and valued for the adaptation services it provides</p>	<p>No targets or indicators</p>	<p>Develop policies that account for resiliency aims, would be a cross cutting theme over multiple subjects. Sustainability objectives that seek a better adaptation to climate change, including mitigations of climate change. Include SA objectives which seek to promote the implementation of adaptation</p>

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<p>Profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping to maintain ecosystem services and protect and enhance biodiversity.”</p> <p>Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”</p> <p>People &amp; The Built Environment – “To promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change, and able to capitalise on the potential health gains associated with tackling it”.</p> <p>“A health service, a public health and social care system which are resilient and adapting to a changing climate.”</p> <p>“Buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”</p> <p>“Emergency services and local resilience capability take account of and are resilient to, a changing climate”</p> <p>Business &amp; Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change”</p> <p>Local Government – “Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate”</p>		<p>measures to make the area more resilient to a changing climate.</p>
<p>Historic England Corporate Plan 2018-2021</p>	<p>No targets or indicators</p>	<p>Develop policy that protects important heritage assets. Sustainability objectives that consider the contribution of historical assets to the built environment, as well as, benefits to community/social inclusion.</p>
<p><b>REGIONAL POLICIES</b></p>		
<p>Site Improvement Plan: South Pennine Moors</p> <p>The plan provides a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outlines the priority measures required to improve the condition of the features. It does not cover issues where remedial actions are already in place or ongoing management activities which are required for maintenance.</p>	<p>The Moors are vulnerable to 15 defined threats and pressures that can be caused by identified impact pathways. Measures for avoiding, mitigating and reversing these effects are identified and costed.</p>	<p>The CSPR and Site Allocations DPD should seek to avoid having a significant effect on the South Pennine Moors via the identified impact pathways.</p>
<p>Nidderdale AONB Management Plan 2014 - 2019</p>	<p>Vision, Management Plan Policies for the AONB in order to</p>	<p>The CSPR and Site Allocations DPD should</p>

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<p>Sets out how the special qualities of this nationally important landscape can be maintained in a way that does not harm the interests of people who live and work in the AONB.</p> <p>The Plan coordinates action by land managers, members of the AONB’s rural communities, third sector bodies like the National Trust, local authorities and Government agencies. It contains policies that say what the AONB stands for and a vision of how the AONB should look in 2050, and objectives that are designed to help towards achieving the vision.</p>	<p>protect and enhance the landscape.</p> <p>L1 – Promote awareness and understanding of the special qualities of the AONB</p> <p>L2 – Maintain and enhance the special qualities of the AONB’s landscape including priority wildlife habitats and restore damaged or degraded features</p> <p>L3 – Take action to ensure characteristic features of the AONB’s landscape are resilient to climate change by working independently and in partnership with other protected areas across the northern uplands where possible</p> <p>L4 – Resist applications for planning permission for major development, and applications for smaller scale development that conflict with the purposes of designation in and adjacent to the AONB boundary</p> <p>L5 – Promote the highest standards of design, choice of materials and environmental performance standards in new development, and in the conversion and restoration of old buildings</p> <p>L6 – Encourage sustainable development to create affordable housing, new enterprise based on environmental qualities including farm diversification and green tourism ventures, small-scale renewable energy schemes and other small-scale development that makes a positive contribution to maintaining landscape character and to the repair of damaged or degraded landscape features</p> <p>NE1 – Work in partnership with land managers and conservation organisations to ensure designated sites, including those designated for their geological interest, are managed to the highest standards in accordance with international, national and local guidelines</p>	<p>seek to accord with the AONB Management Plan in order to help protect and enhance its character.</p>

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	<p>NE2 – Support landowners to improve management of Habitats of Principle                      Importance so that 90% are in favourable or recovering condition by 2019 and ensure funding is available to create new areas of priority habitat by 2017</p> <p>NE3 – Work with landowners and partners to secure compliance with Water Framework Directive criteria for ‘Good Ecological Status’ for all rivers and still waters by 2019</p> <p>HE1 – Protect the historic landscape and features of archaeological importance by resisting inappropriate development and supporting owners and managers to improve condition where possible</p> <p>HE2 – Support innovative proposals for sustainable future use of historic buildings and structures where this does not cause unacceptable harm to the asset or the wider landscape</p> <p>HE3 – Encourage initiatives designed to increase awareness and understanding of archaeology and the historic environment</p> <p>UE1 – Support North Yorkshire County Council’s efforts to improve the quality and accessibility of the rights of way network</p> <p>UE2 – Reduce the impact of vehicular use of Unsurfaced Unclassified Roads where this is having an adverse impact on conservation of the natural and cultural heritage of the AONB and its enjoyment by the public</p> <p>UE3 – Increase understanding and awareness of the AONB through communications, events and volunteering to deliver AONB statutory purposes</p> <p>LW1 – Work closely with established and new businesses to ensure that changing practices, and plans for growth and expansion, increase business</p>	

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
	<p>viability and have a positive effect on the AONB                      LW2 – Support growth of tourism businesses that do not cause landscape harm, cause damage to or have an adverse impact on protected wildlife sites, that comply with the principles of sustainable tourism, and that actively contribute to improving environmental quality</p>	
<p>Leeds City Region Development Programme                      Leeds City Council, November 2006                      The Leeds City Region Development Programme is an economic plan for the city region, built on the three principles of subsidiary, added value, and co-operation between the eleven local authorities. The shared vision for the Leeds City Region is: “to develop an internationally recognised city-region; to raise economic performance; to spread prosperity across the whole of the city region, and to promote a better quality of life for all of those who live and work here.”                      The Development Programme is the action plan that sets out how the partner authorities will deliver their shared Vision.</p>	<p>No targets or indicators</p>	<p>Local Plan policy framework should be developed with due regard to the vision and aims of the Development Programme. The SA should take into consideration the vision and aims of the Development Programme and SA objectives / decision making criteria relating to economic performance and quality of life included within the SA framework.</p>
<p>Transport Strategy 2040 (WYCA, 2017)                      This strategy aims to put in place the right transport conditions - building on the City Region’s strengths and tackling underlying issues - meeting increasing demand for travel in a sustainable way while also realising the ambitions for inclusive growth contained in SEP and District local plans. It also aims to influence and make the most of investment decisions being made at the pan-northern and national levels, to maximise opportunities for our region. The Transport Strategy 2040 ambitions and policies are framed within six core themes:                      Inclusive Growth, Environment, Health and Wellbeing                      Road network                      Places to live and work                      One System Public Transport                      Smart futures                      Asset management and resilience</p>	<p>The strategy sets out a number of transport targets:                      25% more trips made by bus by 2027                      75% more trips made by rail by 2027                      300% more trips made by bicycle by 2027</p>	<p>Local Plan policy framework should be developed with due regard to the vision and policies of the Strategy. The SA should take into consideration the vision and policies of the Strategy and SA objectives / decision making criteria relating to economic performance, road safety and quality of life included within the SA framework</p>
<p>West Yorkshire Local Transport Plan (2011 – 2026)                      The third West Yorkshire LTP sets out a programme for a wide range of improvements to local transport over the period 2011 to 2026.                      Objectives of LTP3                      Public feedback helped shape the Plan, which is entitled ‘My Journey’, and has three main objectives:                      Economy To improve connectivity to support economic activity and growth in</p>	<p>The plan includes the following indicators to monitor progress of the plan:                      Journey Time Reliability;                      Access to employment;                      Mode share;                      Emissions of CO2 from transport;                      All road casualties – people killed or seriously injured</p>	<p>Local Plan should take account of the LTP objectives and programme and seek to reflect these in the policy framework. The framework should promote the development of an integrated and safe sustainable transport system, seek to limit transport impacts, and ensure accessibility</p>

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>West Yorkshire and the Leeds City Region;                      Low Carbon To make substantial progress towards a low carbon, sustainable transport system for West Yorkshire, while recognising transport's contribution to national carbon reduction plans;                      Quality of Life To enhance the quality of life of people living in, working in and visiting West Yorkshire.                      The Plan sets out to tackle congestion and a lack of transport investment which are key contributory factors to lower than average economic performance in West Yorkshire. It also aims to prepare for the predicted, post-recession growth in employment, population and housing and their impact on the reliability of the transport network.                      Four themes run through LTP3 to help ensure it achieves its aims:                      Transport Assets focusing on the existing components of the transport network such as roads, bus stations &amp; stops and traffic lights to ensure we are getting the most value out of them                      Travel Choices enabling customers to make the most sustainable choices about when and how they travel                      Connectivity ensuring people can make integrated and safe journeys using transport networks on which they can rely.                      Enhancements improving the overall network to make it more fit for journeys in the future.</p>	<p>Satisfaction with transport</p>	<p>for all.                      The SA should take into consideration the LTP objectives and programme and SA objectives / decision making criteria relating to sustainable transport, road safety and access should be included within the SA framework</p>
<p>The Northern Powerhouse: One Agenda, One Economy, One North                      Transport for the North report prepared by Government, the Northern City Regions and Local Enterprise Partnerships. The aim is to transform Northern growth, rebalance the country's economy and establish the North as a global powerhouse. The strategy sets out how transport is a fundamental part of achieving these goals and how the long-term investment programmes will be developed.                      Transform city to city rail connectivity east/west and north/south through both HS2 and a new Trans-North system, radically reducing travel times across this intercity network;                      Ensure there is the capacity that a resurgent North will need in rail commuter services;                      Deliver the full HS2 'Y' network as soon as possible, including consideration of accelerating construction of Leeds-Sheffield;                      Enhance the performance of the North's Strategic Road Network (SRN) through delivery of the committed first phase of the Roads Investment Strategy;                      Further enhance the long-term performance of the Northern SRN through a clear vision and strategy that embraces transformational investment and technology;                      Set out a clearly prioritised multimodal freight strategy for the North to support</p>	<p>No target or indicators.</p>	<p>Local Plan should take account of the vision and objectives and seek to reflect these in the policy framework.                      The SA should take into consideration the vision and objectives and SA objectives / decision making criteria relating to sustainable transport, road safety and access should be included within the SA framework</p>

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>trade and freight movement within the North and to national/international markets;</p> <p>Pursue better connections to Manchester Airport through TransNorth, whilst city regions consider connectivity to the North’s other major airports; and</p> <p>Develop integrated and smart ticket structures to support our vision of a single economy across the North.</p>		
<p>Leeds City Region Green Infrastructure Strategy (Leeds City Region Partnership, 2010)</p> <p>This strategy sets out the vision for green infrastructure in the city region and to determine how future investment in green infrastructure will be secured and where investment should be targeted.</p> <p>The vision is that “Green infrastructure will shape the future economic, social and environmental success of the Leeds City Region by harnessing the potential of existing environmental resources to promote sustainable economic growth and to tackle climate change”.</p> <p>Four strategic objectives have been selected to directly address the key drivers of green infrastructure including:</p> <ul style="list-style-type: none"> <li>promote sustainable growth and economic development;</li> <li>adapt to and mitigate climate change;</li> <li>encourage health and wellbeing; and</li> <li>improve biodiversity</li> </ul>	<p>No targets or indicators.</p>	<p>Ensure that site allocations and policies reflect the vision and objectives of the strategy.</p> <p>Include sustainability objectives relating to health and wellbeing, enhancement of open space, provision of sustainable transport, biodiversity and climate change.</p>
<p><b>LOCAL POLICIES</b></p>		
<p>Bradford District Plan 2016-2020</p> <p>The Bradford District Plan provides a framework to promote and improve the social, economic and environmental well-being of present and future generations. It sets out the direction of travel for the District, the Council, other public agencies, businesses, voluntary organisations and the public.</p> <p>Through this Plan the Bradford District Partnership is determined to achieve:</p> <ul style="list-style-type: none"> <li>● Better skills, more good jobs and a growing economy</li> <li>● A great start and good schools for all our children</li> <li>● Better health, better lives</li> <li>● Safe, clean and active communities</li> <li>● Decent homes that people can afford to live in</li> </ul>	<p>No target or indicators.</p>	<p>Local Plan policy framework should be developed with due regard to the Bradford District Plan 2016 2020.</p> <p>The SA should take into consideration the key points of the District Plan and SA objectives /decision making criteria relating to the economy, skills and training, environment and heritage should be included within the SA framework.</p>
<p>Economic Strategy for Bradford District 2018 – 2030 Bradford District Economic Partnership, 2017</p> <p>This strategy sets out plans to grow Bradford’s economy by increasing the number of productive businesses and supporting young and enterprising people to innovate, invest and build fulfilling lives in the District.</p> <p>The strategy is focused on unlocking the growth potential of four key</p>	<p>In productivity, jobs, earnings and skills the target is to become better than the UK average.</p> <p>PRODUCTIVITY Raising productivity is key economic challenge. The District want to raise Gross Value Added (GVA) per head of population from a current figure of £18,600 to £26,600 to the match the UK average. Achieving this would increase the</p>	<p>Local Plan should take account of the vision, priorities and actions detailed in the Economic Strategy and seek to reflect these in the policy framework.</p> <p>The SA should take into consideration the vision, priorities and actions detailed in the</p>

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>opportunities:  <b>YOUNG &amp; ENTERPRISING POPULATION</b> Ensuring all people are equipped with the skills and confidence to succeed.  <b>DISTINCTIVE OFFER</b> Using unique architecture, heritage and cultural assets to create compelling investment propositions and an environment for growth.  <b>GROWTH POTENTIAL</b> Building on business and sector strengths to drive innovation, increase productivity and create wealth.  <b>GLOBALLY CONNECTED DISTRICT</b> Improving transport infrastructure and digital connectivity to strengthen global trading links and access new markets.</p>	<p>value of our economy from £10bn to £14bn  <b>EMPLOYMENT</b> More people getting good jobs will increase productivity and ensure the benefits of growth are spread more widely. Bradford’s employment rate has consistently lagged behind the UK rate over the past decade. The average gap over this period equates to 20,000 people  <b>SKILLS</b> Higher level skills attainment is the single most important determinant of labour market success and a key driver of productivity growth. NVQ3 equates to two or more A levels. The partnership wants to support 48,000 residents to raise their skills level to NVQ3 and above.  <b>EARNINGS</b> Raising the earnings of people that live in the District will reflect the move to a more productive and prosperous local economy and make a real difference to people’s lives  <b>SUSTAINABILITY</b> Bradford District has comparatively low levels of CO2 emissions per capita. The challenge will be to maintain emissions below national and northern levels as we grow our economy.</p>	<p>Economic Strategy and SA objectives /decision making criteria relating to each of the key priorities should be included within the SA framework.</p>
<p>Bradford District Woodland Strategy (February 2002)  The Woodland Strategy expresses the Councils commitment to improving the amount of woodland cover and the quality of woodlands in Bradford. Several policies are identified:  Protect existing woodland and tree cover through development control powers, tree preservation orders and planning briefs.  Promote woodland management plans which enhance the value of woodlands.  Continue efforts to increase the woodland cover of the District.  Encourage the recreational and educational use of appropriate woodlands.  Uphold the Hedgerow Regulations and protect important hedgerows from removal.  Establish a register of important hedgerows within the District.  Protect other hedges and stone walls from inappropriate development or by use of planning conditions, where appropriate, and encourage good management practises for existing hedge and wall boundaries.</p>	<p>The Strategy includes the following indicator: Hectares of trees planted on council-owned / private land.</p>	<p>Local Plan should take account of the policies within the Woodland Strategy and seek to reflect these in the policy framework as appropriate.  The SA should take into consideration the objectives and policies of the Woodland Strategy and SA objectives / decision making criteria relating to protecting and enhancing woodland habitat should be included within the SA framework.</p>
<p>Nature Conservation Strategy for Bradford – Nature and People  The Nature Conservation Strategy includes the following aims:  Clearly map those sites which are considered important for nature conservation, linking these sites to the UDP.  Protect those sites and species and safeguard their future.  Encourage the management of land for the benefit of wildlife where possible.</p>	<p>No target or indicators.</p>	<p>Local Plan should take into account the aims, objectives and policies of the Nature Conservation Strategy and seek to incorporate these in the policy framework. A policy on biodiversity should be included, which ensures the protection and</p>

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>Improve access to natural areas where appropriate and increase awareness and education about the environment and the habitats and species within it.</p> <p>The Nature Conservation Strategy objectives are to:</p> <ul style="list-style-type: none"> <li>Protect the natural resource and assets of the District.</li> <li>Identify and describe the natural environment resource.</li> <li>Manage and improve the quality of the environment.</li> <li>Develop access to areas of nature conservation value.</li> <li>Educate and increase public awareness.</li> <li>Promote community involvement and development environmental partnerships.</li> </ul>		<p>enhancement of the natural environment resource.</p> <p>The SA should take into consideration the aims, objectives and policies of the Nature Conservation Strategy and SA objectives /decision making criteria relating to protecting and enhancing the natural environment, improving access to natural areas where appropriate and increasing education and awareness about the natural environment should be included within the SA framework.</p>
<p>A Stronger Communities Strategy for Bradford District 2018 – 2023 (Draft)</p> <p>The strategy focuses around four thematic priorities:</p> <ul style="list-style-type: none"> <li>Equality of opportunity - addressing factors affecting economic participation and poverty including language skills and educational attainment.</li> <li>Promoting greater interaction, dialogue and understanding between people from different backgrounds given the diversity of the population and the extent of residential and educational segregation; ensuring that people understand fully their rights and freedoms and their responsibilities.</li> <li>Generating and connecting people to opportunities to participate in community and civic life and strengthening leadership.</li> <li>Tackling crime and the fear of crime so that everyone feels safe.</li> </ul>	<p>No target or indicators.</p>	<p>Local Plan should take account of the work areas of the Plan and seek to ensure that these are addressed in the policy framework where appropriate.</p> <p>The SA should take into consideration the work areas of the Plan and SA objectives /decision making criteria relating to ensuring access for everyone, encouraging participation and involvement, increasing community cohesion and improving safety should be included within the SA framework.</p>
<p>Bradford Children, Young People and Families Plan 2017 – 2020</p> <p>This Plan set out the priorities for children, young people and families, how we plan to achieve these, who is responsible, and what success will look like.</p> <p>It has the following key priorities:</p> <ul style="list-style-type: none"> <li>Ensuring that our children start school ready to learn</li> <li>Accelerating education attainment and achievement</li> <li>Ensuring our children and young people are ready for life and work</li> <li>Safeguarding the most vulnerable and providing early support to families</li> <li>Reducing health and social inequalities, including tackling child poverty, reducing obesity and improving oral health</li> <li>Listening to the voice of children, young people and families and working with them to shape services and promote active citizenship</li> </ul>	<p>No target or indicators.</p>	<p>Local Plan should take account of the key issues and objectives in the Young People and Families Plan and the policy framework should contribute positively towards achieving these.</p> <p>The SA should take into consideration the key issues and objectives in the Young People and Families Plan and SA objectives / decision making criteria relating to improving health and well-being and improving education and training opportunities and participation should be included within the SA framework.</p>
<p>Bradford Local Investment Plan 2011-2020</p> <p>The Local Investment Plan sets out the housing investment requirements for the</p>	<p>No target or indicators.</p>	<p>Local Plan should take account of the aims of the Investment Plan and the policy</p>

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>next three years, which are necessary for supporting the delivery of Bradford’s Housing and Economic Strategies and underpinning wider economic success across the District.</p>		<p>framework should contribute positively towards achieving these</p>
<p>Housing and Homelessness Strategy for Bradford District 2014 – 2019 This strategy represents the commitment of the Council and its partners to meet the housing requirements of the District. These requirements have been identified through consultation and research, including the production of other relevant socio-economic plan and programmes. The four main objectives of this strategy are: More homes: Build sufficient new homes to meet the needs of a growing population. New homes of the right type in the right location. Make better use of existing housing to meet growth needs by bringing empty homes back into use. Make sure there is the appropriate infrastructure to support housing growth. Safe and healthy homes Ensure all housing is free from the worst hazards. Make sure homes support people to stay healthy. Adapt homes so people can stay independent. Encourage all landlords and lettings agents to provide safe and healthy homes with decent management of tenancies. Tackle the blight of empty homes.</p> <p>Affordable homes Ensure an adequate supply of affordable homes to buy or rent that match household incomes. Enable people to affordably heat and sustain their homes by helping them make their homes more efficient. Support independence and prevent homelessness Provide support and advice to help people to live independently and prevent homelessness. Raise aspirations and remove the barriers to employment so households can sustain their housing independence</p>	<p>The strategy sets out a series of success measures including: An increase in net additional homes provided A reducing number of long-term empty homes An increase in the number of private sector homes where housing conditions have been improved through intervention measures More homes adapted An increase in the number of new affordable homes delivered More energy efficient homes in the District, and fewer people living in fuel poverty An increase in average incomes across the District An improvement in the number of housing advice cases which successfully and sustainably prevent people becoming homeless A reducing number of homeless people placed in bed and breakfast accommodation and shorter stays in temporary accommodation Targeting support at those who need it most and at the right time</p>	<p>Local Plan should take account of the vision and objectives of the Housing Strategy and the policy framework should seek to address these. A policy on housing provision and supply should be included, which sets out housing requirements, including housing quality, density and affordability.</p>
<p>Bradford Housing Strategy for the over 50’s 2011-2021 The Housing Strategy for the over 50’s seeks to provide for and meet the housing needs of the over 50’s in Bradford. The strategy has the following objectives: Increase choice; Support everyone; Work Together;</p>	<p>No target or indicators.</p>	<p>Local Plan should take account of the objectives of this strategy. A policy on housing mix should be included which will set out how the Council will deliver the right housing mix to meet the diverse needs of the population of Bradford,</p>

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>Make People Aware; Make It Sustainable; and Manage the Impact of Change.</p>		<p>including the elderly.</p>
<p>The Bradford District Strategic Housing Market Assessment (SHMA) 2010 and SHMA Update 2013. The SHMA is an assessment of Bradford’s Housing Market and consists of four core areas: a review of housing markets; an assessment of housing need and affordable requirements; a review of general market requirements; and provides policy recommendations. Estimates of current dwellings in terms of size, type, condition, tenure. Analysis of past and current housing market trends, including balance between supply and demand in different housing sectors and price/affordability. Description of key drivers underpinning the housing market. Estimate of total future number of households, broken down by age and type where possible. Estimate of current number of households in housing need. Estimate of future households that will require affordable housing. Estimate of future households requiring market housing. Estimate of the size of affordable housing required. Estimate of household groups who have particular housing requirements including: families, older people, key workers, black and minority ethnic groups, disabled people, young people, Gypsies and Travellers.</p>	<p>No target or indicators.</p>	<p>A policy on housing provision and supply should be included, which sets out housing requirements, including housing quality, density and affordability. This should be based on an updated and revised version of the SHMA which utilises the most up to date background data.</p>
<p>Saltaire World Heritage Site Management Plan 2014 The Plan is a partnership document. It sets out a strategic framework for management actions and its purpose is to help co-ordinate the activities of all involved. The Plan works within the Council’s Development Plan (or Local Plan) for the area which sets out planning policies to guide development. The Management Plan is a material consideration in the planning process.</p>	<p>World Heritage Site Boundaries Saltaire Conservation Area Boundary Other Values of Saltaire World Heritage Planning, Policy and Legislative Framework Ongoing Monitoring of Significance and use of the World Heritage Site Key Management Issues8 Strategic Themes Objectives and Actions</p>	<p>CSPR and Site Allocations DPD should seek to conform with the requirements and recommendations set out in the Saltaire World Heritage Site Management Plan (2014 revised version).</p>
<p>City of Bradford Metropolitan District Council Rights of Way Improvement Plan April 2007  ROWIPs are intended to be the prime means by which local highway authorities will identify the changes to be made in respect of the management of, and improvement to, their local rights of way network, in order to meet the government’s aim of better provision for walkers, cyclists, equestrians and people with mobility problems.</p>	<p>Policy statements on Promotion Accessibility Maintenance Obstructions and Nuisances Definitive Map Issues Public Path Orders Crime Related Issues Partnership Working Stakeholder Liaison</p>	<p>CSPR and Site Allocations DPD should seek to conform with the requirements and recommendations set out in the ROWIP.</p>

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Key objectives relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Key messages/targets/indicators relevant to the Core Strategy DPD: Partial Review & Site Allocations DPD	Implications for to the Core Strategy DPD: Partial Review & Site Allocations DPD
<p>Bradford Local Biodiversity Action Plan</p> <p>The biodiversity offering in Bradford is summarised at:  <a href="https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/biodiversity/">https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/biodiversity/</a></p> <p>A local plan is also set out, which essentially confirms the habitats and species protected in Bradford as well as which habitats are subject to their own action plans.</p>	<p>Planning Applications</p> <p>The following Habitats and Species have Action Plans to protect and enhance their status in the Bradford District.</p> <p>Habitats                      Upland Oak Woodland; River Corridors; In Bye Pasture; Hedgerows</p> <p>Species                      Otter; Water Vole; Pipistrelle; Brown Hare; Crayfish                      Grayling (fish); White Letter Hairstreak; Green Hairstreak; Blue Butterflies; Twite; Yellowhammer                      Lapwing; Lesser Twayblade; Marsh Fern</p> <p>Habitat Action Plans                      Enclosed pasture and hay meadow below open moorland; Rushes and wet flushes; Wide variety of invertebrates; Important for wading birds – snipe, curlew, lapwing and redshank</p>	<p>CSPR and Site Allocations DPD should seek to protect and enhance biodiversity in Bradford, particularly that which is afforded protection through the local biodiversity plan.</p>

## APPENDIX B

### Summary of Baseline Data and Sustainability Issues

This appendix provides a summary of the environmental baseline data for Bradford (**Table B.1**) and the key sustainability issues in the District (**Table B.2**). For complete information, please see the SA Scoping Report that is available online.

Table B.1: Summary of environmental baseline data in Bradford

Theme	Baseline data for Bradford	Data source			
<b>Population</b>					
Population Growth	524,600 (mid 2012) 532,500 (mid 2016) 534,800 (mid 2017)	Mid-Year Population Estimates 2017 (ONS, June 2018) Bradford District Population Update – Intelligence Bulletin (CBMDC, July 2018)			
Population Growth	The Sub-National Population Projections from 2016 to 2039 for Bradford District show an increase in population of 9.1% with an additional 49,000 people predicted to live in the area. The same projections show that the population will increase by 4.3% to 557,100 in 2026 and by a further 4% to 579,000 by the proposed end of the plan period in 2037.	Sub-National Population Projections 2014-based (ONS, May 2016)			
Population Age Structure	<b>Age group</b>	<b>2016</b>	<b>2026</b>	<b>2037</b>	Sub-National Population Projections 2014-based (ONS, May 2016)
	0 - 4	7.5%	7.0%	6.8%	
	5 - 19	21.2%	21.0%	19.7%	
	20 - 49	40.0%	37.9%	37.2%	
	50 – 64	16.8%	17.2%	16.1%	
	65 – 84	12.5%	14.5%	16.5%	
85+	1.9%	2.4%	3.6%		
Population Ethnicity	White British: 63.9% Pakistani: 20.4% White Irish/Other: 3.5% Indian: 2.6% Mixed Heritage: 2.5% Bangladeshi: 1.9% Other Asian: 1.5% Other ethnic groups: 1.5% African: 1% Caribbean: 0.7% Chinese: 0.4% Other Black: 0.1% Gypsy or Irish Traveller: 0.1%	Census 2011 - Ethnic Group, Local Authorities in England and Wales (ONS, 2012) Ethnicity in Bradford – Intelligence Bulletin (CBMDC, January 2017)			
Crime	Crime Rate of 133.59 per 1000 population as recorded for year ending June 2018.	<a href="https://www.police.uk/west-yorkshire/BDT_CI/performance/compare-your-area/">https://www.police.uk/west-yorkshire/BDT_CI/performance/compare-your-area/</a>			

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford			Data source
<b>Housing</b>				
Household Growth	2014-based			Household Projections for England and Local Authority Districts 2014-based (ONS, July 2016)  Household Projections for Local Authorities and Higher Administrative Areas in England 2016-based (ONS, December 2018).  Government guidance and the national formula for measuring housing need is based on the 2014 based projections.
	Year	Household Size	Households	
	2014	2.57	202,850	
	2019	2.54	211,546	
	2024	2.50	218,320	
	2029	2.45	226,381	
	2034	2.41	235,222	
	2039	2.38	240,563	
	2016-based			
	Year	Household Size	Households	
	2016	2.61	200,922	
	2021	2.61	203,696	
	2026	2.58	207,929	
	2031	2.53	212,384	
	2036	2.49	216,535	
2041	2.47	219,926		
2016-based				

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford			Data source
	Projected Households by Age			
	Age Group	Year 2016	Year 2041	
	Under 25	6,659	6,401	
	25 to 34	29,428	27,316	
	35 to 44	39,762	34,338	
	45 to 54	41,211	38,868	
	55 to 64	33,913	36,853	
	65 to 74	24,891	32,268	
	75 to 84	17,788	29,656	
	85+	7,270	14,227	
	2014-based			
	Projected Households by Age			
	Age Group	Year 2014	Year 2039	
	Under 25	66,291	71,344	
	25 to 34	74,618	76,629	
	35 to 44	69,796	68,105	
	45 to 54	66,930	66,810	
	55 to 64	28,985	32,359	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford					Data source
	65 to 74	25,521	28,263			
	75 to 84	39,293	55,301			
	85+	24,328	39,677			
Dwelling Stock by Tenure	Owner Occupied (Owned Outright): 29.3% Owner Occupied (Owned with Mortgage): 35.7% Private Rented: 18.1% Social Rented: 14.8% Share Ownership: 0.6% Other: 1.5%					Census 2011: Tenure, Local Authorities in England and Wales (ONS, 2012) 2011 Census Release 2.1: Key Statistics for Local Authorities - Bradford District 11 December 2012 (CBMDC, December 2012)
Household Types	Detached (Whole House or Bungalow): 14% Semi-Detached (Whole House or Bungalow): 35.6% Terraced (Whole House of Bungalow) (Inc. end terrace): 34.4% Flat, Maisonette or Apartment: 15.8% Other: 0.3%					2011 Census: Dwellings, Household Spaces and Accommodation type, local authorities in England and Wales (ONS, 2012)
House Prices	Average House Price in Bradford District (September 2018): £140,264					UK House Price Index, Land Registry (September 2018)
Housing Affordability	ONS Property Price to Earnings Ratio for Bradford District: 5.2 (2017)					Ratio of house price to residence-based earnings (lower quartile and median), 2002 to 2017 (ONS)  NOMIS data
Net Housing Completions	Bradford Housing Requirement: 2,700 dwellings per annum. Net Housing Completions 2006/2007: 1,578 2007/2008: 2,156 2008/2009: 1,440 2009/2010: 999 2010/2011: 696 2011/2012: 733 2012/2013: 721 2013/2014: 874 2014/2015: 1,134 2015/2016: 1,338 2016/2017: 1,488 2017/2018: 1,438					Leeds City Region Annual Monitoring Report 2017-2018 Housing Land Supply Update (CBMDC, December 2018)
		Adopted Core Strategy Target	No. new homes completed (net)	No. on PDL	Proportion on PDL	Core Strategy

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford						Data source
						Target	
	Regional City	27,750	3,743	3,199	85%	55%	
	Principal Towns	6,900	916	671	73%	50%	
	Local Growth Centres	4,900	1,024	378	37%	15%	
	Local Service Centres	2,550	590	334	57%	35%	
	<b>DISTRICT TOTAL</b>	<b>42,100</b>	<b>6,273</b>	<b>4,581</b>	<b>73%</b>	<b>50%</b>	
Housing Stock Conditions	<p>For all stock, Bradford performs better than the EHS England average for excess cold (4% compared to 6%), marginally better for all hazards, but worse for all other indicators. In particular disrepair (8% in Bradford compared to 5% nationally). It is noteworthy that the levels of excess cold are relatively low in Bradford. This has helped to keep the overall HHSRS levels slightly lower than the average for England despite having slightly higher levels of fall hazards.</p> <p>Comparing Bradford to the EHS England average figures for the private sector stock there is a similar picture with Bradford performing better for excess cold (4% compared to 7%) and all hazards (16% compared with 17%) but worse or similar for all other indicators. Bradford has similar levels to the region of Yorkshire and The Humber for each of the indicators – although some are slightly higher in Bradford for example falls (12% in Bradford compared with 11%), fuel poverty (LIHC being 12% in Bradford compared with 11%) and low income households (30% in Bradford compared with 26%).</p> <p>The average SimpleSAP ratings in Bradford (Figure 7) are higher than those for the regional and England averages for both all stock and the private sector stock</p>						BRE Integrated Dwelling Level Housing Stock Modelling and Database for Bradford Metropolitan District Council BRE, May 2016)
Empty Homes	Date	All	Long Term				
	Oct 2017	8,751	3,931				
	Oct 2016	8,914	3,944				
	Oct 2015	9,277	4,154				
	Oct 2014	9,778	3,942				
	Oct 2013	10,277	3,953				
	Oct 2012	10,548	4,766				
							Live Tables – Table 615: Vacant Dwellings by Local Authority District (MHCLG)
							Tackling Empty Homes in the Bradford District: Delivery Plan 2017-2019 (CBMDC, 2017)

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source																
	Oct 2011	11,210	5,358																		
<b>Health and inequalities</b>																					
Deprivation	Index of Multiple Deprivation Rank: 19				English Indices of Deprivation 2015 (DCLG, September 2015). English Indices of Deprivation 2015 Bradford District in focus (CBMDC, October 2015)																
Poverty	<p>Bradford ranks as the 5th most income deprived District in England. There are wide variations around the District with 27% of the District’s population classed as in the 10% most deprived areas in England, and 6% of the population living in areas classed as in the 10% least deprived areas. The most income deprived areas are located in and around central Bradford and Keighley and the least deprived areas are located in the Wharfe and Aire valleys and villages to the north and west of central Bradford.</p> <p>In the sub-region, Leeds which is ranked 3rd most income deprived District in England. All the other local authority areas in West Yorkshire are ranked higher than Bradford – Kirklees is 16th, Wakefield is 33rd and Calderdale is 77th</p> <p><b>Employment Deprivation:</b> Bradford is ranked 6th most employment deprived local authority in England – this is the same position as in both 2007 and 2010. Birmingham is the most employment deprived local authority in England. Leeds is the most employment deprived local authority in West Yorkshire and is ranked 3rd most employment deprived District in England. All the other local authority areas in West Yorkshire are ranked higher than Bradford – Kirklees is 11th, Wakefield is 17th and Calderdale is 73rd</p> <p><b>Fuel poverty:</b> The latest official fuel poverty statistics show that there were 20,095 households (14.3%) in Bradford District considered to be in fuel poverty according to the ‘Low Income, High Cost’ methodology. This is higher than the rates for Yorkshire and the Humber region (12.1%) and England (11.1%).</p> <p><b>Child Poverty:</b> The most recent national child poverty data for 201615 (published 2018) reported a child poverty rate of 21.8% for Bradford District, compared to 16.6% for England – with 31,580 children and young people aged 0 – 19, living in households with less than 60% of average (median) income. In 2015, the District’s child poverty rate was second highest in the Yorkshire and Humber region</p>				English Indices of Deprivation 2015 (DCLG, September 2015). Poverty & Deprivation – Intelligence Bulletin (CBMDC, October 2018) Sub-Regional Fuel Poverty, England 2016 (DECC) Households Below Average Income (ONS)																
Education & Skills	<p style="text-align: center;"><b>Adult Qualification Levels</b></p> <table border="1"> <thead> <tr> <th></th> <th>Bradford</th> <th>Yorkshire &amp; Humber</th> <th>Great Britain</th> </tr> </thead> <tbody> <tr> <td>NVQ4 and above</td> <td>26.5%</td> <td>33%</td> <td>38.6%</td> </tr> <tr> <td>NVQ3 and above</td> <td>46.6%</td> <td>52.3%</td> <td>57.2%</td> </tr> <tr> <td>NVQ2 and above</td> <td>65.6%</td> <td>71.1%</td> <td>74.7%</td> </tr> </tbody> </table>					Bradford	Yorkshire & Humber	Great Britain	NVQ4 and above	26.5%	33%	38.6%	NVQ3 and above	46.6%	52.3%	57.2%	NVQ2 and above	65.6%	71.1%	74.7%	Nomis ONS Annual Population Survey (January to December 2017)
	Bradford	Yorkshire & Humber	Great Britain																		
NVQ4 and above	26.5%	33%	38.6%																		
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Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source
	NVQ1 and above	78.7%	83.4%	85.4%	
	Other Qualifications	8.2%	7%	6.9%	
	No Qualifications	13.1%	9.5%	7.7%	
	<p>No Qualifications - No formal qualifications held.                      Other Qualifications - includes foreign qualifications and some professional qualifications.                      NVQ 1 Equivalent - e.g. fewer than 5 GCSEs at grades A-C, foundation GNVQ, NVQ 1, intermediate 1 national qualification (Scotland) or equivalent.                      NVQ 2 Equivalent - e.g. 5 or more GCSEs at grades A-C, intermediate GNVQ, NVQ 2, intermediate 2 national qualification (Scotland) or equivalent.                      NVQ 3 Equivalent - e.g. 2 or more A levels, advanced GNVQ, NVQ 3, 2 or more higher or advanced higher national qualifications (Scotland) or equivalent.                      NVQ 4 Equivalent and Above - e.g. HND, Degree and Higher Degree level qualifications or equivalent.</p>				
Life Expectancy		Male	Female		Life Expectancy (LE) at Birth & Age 65 - By sex, UK (2001 to 2003 to 2015 to 2017) (ONS, 2018) Life Expectancy at Birth & Age 65 – Intelligence Bulletin (CBMDC, January 2018)
	Bradford District	77.5	81.5		
	Yorkshire & Humber	78.7	82.4		
	England	79.5	83.1		
	Data from 2014 – 2016				
Obesity	38.2% of the District's 10 to 11-year olds are overweight compared to 34.6% of 10 to 11-year olds regionally and 34.6% nationally				National Child Measurement Programme 2016/17, published 19/10/17, NHS Digital Quality Outcomes Framework, NHS
Health	At a District wide level based on Quality Outcomes Framework (QOF) data registrations with GPs by condition: 56,891 adults were registered as obese with their GP in 2014-15. This is equivalent to 12% of the District population aged 17+ and higher than the national rate of 9%.				Local Authority Health Profile 2018 - Bradford (Public Health England, July 2018)
Physical Inactivity	The main causes of death in Bradford District are the same as other parts of the country – cardiovascular disease, respiratory disease and cancer. However, more people die before the age of 75 in the District than in other parts of the country. In some parts of the District as many as 1 in 2 people die before the age of 75.				Bradford District Joint Strategy Needs Assessment/Public Health England Data
<b>Economy</b>					
Economic Performance	Bradford District's GVA (as of 2016) was £10.05bn, representing 8.7% of the regional total. GVA growth (2015/16) was 2.1% GVA per head of population (2016): £18,810 Bradford's job density is low. Bradford has 690 jobs per thousand work age population compared to 840 nationally.				Gross Value Added – Intelligence Bulletin (CBMDC, December 2017) Centre for Cities Outlook Report 2018 Made in Bradford - Pioneering, Confident & Connected an Economic Strategy for Bradford District 2018-2030

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford		Data source	
Employment and Economic Structure	Employment by Occupation (Ages 16 to 64)			Nomis ONS Annual Population Survey (July 2017 to June 2018)
		Bradford	Great Britain	
	Soc 2010: Major Group 1 to 3	36.8%	45.9%	
	1. <i>Managers, Directors &amp; Senior Officials</i>	8.7%	10.9%	
	2. <i>Professional Occupations</i>	16.3%	20.3%	
	3. <i>Associate Professional &amp; Technical</i>	11.5%	14.5%	
	Soc 2010 Major Group 4-5	21.9%	20.4%	
	4. <i>Administrative &amp; Secretarial</i>	11.4%	10.2%	
	5. <i>Skilled Trades Occupations</i>	10.3%	10.1	
	Soc 2010: Major Group 6-7	19.6%	16.7%	
	6. <i>Caring, Leisure &amp; Other Service Occupations</i>	11.0%	9%	
	7. <i>Sales &amp; Customer Service Occupations</i>	8.4%	7.6%	
	Soc 2010: Major Group 8-9	21.7%	17%	
8. <i>Process Plant &amp; Machine Operatives</i>	9.7%	6.3%		
9. <i>Elementary Occupations</i>	11.9%	10.6%		
Earnings		Bradford	Great Britain	ONS Annual Survey of Hours & Earnings – Workplace Analysis - Nomis ONS Annual Population Survey (January to December 2017) Employment & Skills – Intelligence Bulletin (CBMDC, November 2016)
	Gross Weekly Pay (Full Time)	£498.20	£570.90	
	<i>Male Workers (Full Time)</i>	£545.80	£611.80	
	<i>Female Workers (Full Time)</i>	£453.00	£509.80	
Economic Activity & Employment	Economic Inactivity Rates (July 2012 to June 2018) (Ages 16 to 64)			Nomis ONS Annual Population Survey Bradford District Monthly Unemployment Update – Intelligence Bulletin (CBMDC, December 2018)
		Bradford	England	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford					Data source	
	July 2012 to June 2013	26.9%	23.1%			Made in Bradford - Pioneering, Confident & Connected an Economic Strategy for Bradford District 2018-2030	
	July 2013 to June 2014	26.5%	22.7%				
	July 2014 to June 2015	28.4%	22.5%				
	July 2015 to June 2016	28.3%	22.1%				
	July 2016 to June 2017	27.8%	22.0%				
	July 2017 to June 2018	28.6%	21.6%				
	Economic Activity Rates (July 2012 to June 2018) (Ages 16 to 64)						
		Bradford	Great Britain				
	July 2012 to June 2013	65.6%	70.9%				
	July 2013 to June 2014	66.1%	71.9%				
	July 2014 to June 2015	64.9%	73%				
	July 2015 to June 2016	65.1%	73.8%				
	July 2016 to June 2017	67.8%	74.2%				
	July 2017 to June 2018	68.1%	75%				
Employment Land	Total Additional Employment Floorspace						Annual Monitoring Reports (2013 to 2017) (CBMDC)
		2012/13	2013/14	2014/15	2015/16	2016/17	
	Gross Internal Floorspace (m <sup>2</sup> )	1,680	5,065	5,614	18,652	No date available	
	Net Internal Floorspace (m <sup>2</sup> )	1,617	5,065	-	-	-	
City Centre	The city centre remains the key location for employment in the District, particularly office-based employment. There are 33,500 jobs located in Bradford city centre which is one in six jobs in Bradford There are 10,700 jobs in financial and business services, 10,500 in the public sector, 3,800 in retail and 1,700 in accommodation and food services based in the city centre.					Made in Bradford - Pioneering, Confident & Connected An Economic Strategy for Bradford District 2018-2030 Bradford Council economy webpages	

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Theme	Baseline data for Bradford	Data source																						
	<p>Bradford’s city centre is a top UK retail centre generating £423 million of comparison retail expenditure in 2015 according to CACI Retail Footprint data.</p> <p>There is a strong and vibrant presence of cultural and visitor attractions in the city centre. In 2013 an estimated 4m people visited City Park, whilst the National Media Museum (circa 500,000 visitors), Alhambra Theatre (250,000 theatregoers), St Georges Hall and The Leisure Exchange are jointly seeing nearly 1million visitors per annum go through their doors. Bradford is also the world’s first UNESCO City of Film and plays host to the annual Bradford International Film Festival at the National Media Museum and its associated cinemas.</p> <p>Bradford city centre is also home to both the University of Bradford and Bradford College.</p>	Bradford City Centre AAP																						
<b>Natural Environment</b>																								
Landscape	<p>National Park:</p> <ul style="list-style-type: none"> <li>- Yorkshire Dales National Park</li> </ul> <p>Area of Outstanding Natural Beauty (AONB)</p> <ul style="list-style-type: none"> <li>- Nidderdale</li> </ul> <p>The District is located with three National Landscape Character Areas as defined by Natural England:</p> <ul style="list-style-type: none"> <li>- NCA36: Southern Pennines</li> <li>- NCA37: Yorkshire Southern Pennine Edge</li> <li>- NCA38: Nottinghamshire, Derbyshire &amp; Yorkshire Coalfield</li> </ul>	<p>DEFRA Magic Maps</p> <p>NCA Profile 36: Southern Pennines (Natural England, July 2017)</p> <p>NCA Profile 37: Yorkshire Southern Pennine Edge (Natural England, 2013)</p> <p>NCA Profile: 38. Nottinghamshire, Derbyshire and Yorkshire Coalfield (Natural England, 2013)</p>																						
Biodiversity	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center; background-color: #f4b084;">HABITATS FOUND IN THE BRADFORD DISTRICT</td> </tr> <tr> <td colspan="2" style="text-align: center; background-color: #f4b084;">National/Yorkshire and Humberside Key Habitats</td> </tr> <tr> <td style="width: 50%;">Species Rich Hedgerows*</td> <td style="width: 50%;">Upland Oakwood*</td> </tr> <tr> <td>Lowland Heathland Upland</td> <td>Upland Mixed Ashwood</td> </tr> <tr> <td>Upland Heathland</td> <td>Wet Woodlands</td> </tr> <tr> <td>Fens</td> <td>Lowland Hay Meadow</td> </tr> <tr> <td>Reedbeds</td> <td>Lowland Dry Acid Grassland</td> </tr> <tr> <td>Blanket Bog</td> <td></td> </tr> <tr> <td colspan="2">Local Key Habitats**</td> </tr> <tr> <td>In-Bye Pasture*</td> <td>River Corridors*</td> </tr> <tr> <td colspan="2" style="text-align: center; background-color: #f4b084;">SPECIES FOUND IN THE BRADFORD DISTRICT</td> </tr> </table>	HABITATS FOUND IN THE BRADFORD DISTRICT		National/Yorkshire and Humberside Key Habitats		Species Rich Hedgerows*	Upland Oakwood*	Lowland Heathland Upland	Upland Mixed Ashwood	Upland Heathland	Wet Woodlands	Fens	Lowland Hay Meadow	Reedbeds	Lowland Dry Acid Grassland	Blanket Bog		Local Key Habitats**		In-Bye Pasture*	River Corridors*	SPECIES FOUND IN THE BRADFORD DISTRICT		<p>Biodiversity 2020: A Strategy for England’s Wildlife &amp; Ecosystem Services (DEFRA, 2011)</p> <p>Bradford Council Website – Biodiversity</p>
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EU Habitats Sites	<p>Special Area of Conservation (in Bradford District)</p> <ul style="list-style-type: none"> <li>- South Pennine Moors (65,025.5ha)</li> </ul> <p>Special Areas of Conservation (within 20km):</p> <ul style="list-style-type: none"> <li>- North Pennine Moors</li> <li>- Craven Limestone Complex</li> <li>- Denby Grange Colliery Ponds</li> </ul> <p>Special Protection Areas (in Bradford District):</p> <ul style="list-style-type: none"> <li>- South Pennine Moors Phase 2</li> </ul> <p>Special Protection Areas (within 20km):</p> <ul style="list-style-type: none"> <li>- North Pennine Moors</li> </ul>	DEFRA Magic Maps																														

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Theme	Baseline data for Bradford	Data source
Nature Conservation Sites	<p>- South Pennine Moors Phase 1</p> <p>Sites of Special Scientific Interest</p> <ul style="list-style-type: none"> <li>- South Pennine Moors (20,944ha)</li> <li>- Bingley South Bog (4.45ha)</li> <li>- Trench Meadows (4.8ha)</li> </ul> <p>Sites of Ecological/Geological Importance – 22</p> <p>Bradford Wildlife Areas - 152</p>	<p>DEFRA Magic Maps</p> <p>Bradford Council Website - Biodiversity</p>
Minerals	<p>The principle mineral resources in Bradford District are:</p> <p>Sandstone – capable of being used for high quality building, roofing and paving stones. The primary commodity extracted in the area.</p> <p>Sand &amp; Gravel – no significant sand extraction has taken place in the District from some years.</p> <p>Fireclay – this is extracted at two sites in the area for brick making and engineering purposes</p> <p>Coal – no significant extraction of coal has taken place in the District for some years.</p>	<p>Bradford Local Plan Core Strategy – Minerals Chapter (CBMDC, July 2017)</p> <p>Bradford Local Plan Core Strategy DPD – Appendix 13 (CBMDC, July 2017)</p> <p>Mineral Resource Information in Support of National, Regional &amp; Local Planning: West Yorkshire – Report (British Geological Survey, 2006)</p> <p>Mineral Resource Information in Support of National, Regional &amp; Local Planning: West Yorkshire – Map (British Geological Survey, 2006)</p>
Flooding	<p>There are a number of sources of flooding across Bradford District.</p> <p>Main Rivers</p> <p>The main rivers in the area are found in two catchments:</p> <ul style="list-style-type: none"> <li>• Aire &amp; Calder Catchment</li> <li>• River Aire</li> <li>• River Worth</li> <li>• North Beck (part)</li> <li>• Silsden Beck</li> <li>• Bridgehouse Beck</li> <li>• Eastburn Beck</li> <li>• Providence Lane</li> <li>• Nab Wood Beck</li> <li>• Wharfe &amp; Lower Ouse Catchment</li> <li>• River Wharfe</li> <li>• Town Beck</li> <li>• Backstone Beck</li> </ul> <p>Ordinary Watercourse Flooding</p> <p>Ordinary watercourses in the Aire catchment from Steeton Ings to the Craven Boundary are managed by both the Airedale IDB and CBMDC.</p> <p>The vast network of ordinary watercourses in Bradford District, many of which are unmapped. Most notably, Bradford Beck which traverses Bradford City Centre and the many tributaries such as Pitty Beck, Chellow Dene Beck, Eastbrook, Westbrook and Bowling Beck</p> <p>Surface Water Flooding</p> <p>Surface water and drainage related issues are known to cause flood risk in Idle, Apperley Bridge,</p>	<p>Bradford Local Flood Risk Management Strategy (CBMDC, December 2016)</p> <p>Strategic Flood Risk Assessment, Level 1 (SFRA), Final Draft Report amended February 2014 (CBMDC, 2014)</p>

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Theme	Baseline data for Bradford	Data source
	<p>Addingham, Silsden, Cross Hills on Skipton Road and Bradford City Centre, Mill Hey, Haworth, Keighley, Castlefields industrial estate, Bingley.</p> <p>Groundwater Flooding Bradford has a high proportion of properties with cellars compared to many other cities in the UK and has recorded between 550 and 725 calls per year regarding flooded cellars. Possible flood sources include groundwater.</p> <p>Sewer Flooding Within many areas of CBMDC surface water runoff is channelled into the combined sewer system. During wet weather, the capacity of the system is often exceeded or affected by blockage and this is managed through Combined Sewer Overflows (CSOs) which discharge to watercourses and exist in considerable numbers within the Bradford District</p> <p>Reservoir Flooding There are a number of reservoirs within the Bradford District. These are the responsibility of either YWS Ltd or in the case of Upper and Lower Chellow, Harold Park and Park Dam, the CBMDC.</p> <p>Canal Flooding The Leeds and Liverpool canal runs through Bradford District and is managed by the Canal and River Trust.</p>	
<b>Built Environment</b>		
Heritage	<p>The historic environment of Bradford District is significant.</p> <p>World Heritage Site: 1 (Saltaire)</p> <p>Conservation Areas: 59</p> <p>Scheduled Ancient Monuments: 194</p> <p>Listings Buildings: 2,287 (23 of which are Grade I listed)</p> <p>Registered Historic Parks and Garden: 14</p> <p>Historic Battlefield Site: 1 (Adwalton Moor, Tong)</p> <p>At Risk Register: 11 of the area's listed buildings are on Historic England's "Heritage at Risk" register, whilst 11 of conservation areas are at risk – categorised as deteriorating and in either "poor" or "very bad" condition</p>	<p>DEFRA Magic Map</p> <p>National Heritage List for England (Historic England)</p> <p>Heritage at Risk Register (Historic England)</p> <p>Heritage &amp; Culture – Intelligence Bulletin (CBMDC, November 2018)</p> <p>Conservation Area Assessments &amp; Management Plans (CBMDC)</p> <p>Saltaire World Heritage Site Management Plan (CBMDC, 2014)</p>
<b>Connectivity</b>		
Roads/ Congestion	<p>The transport network in the urban area of Bradford City is strongly characterised by a radial pattern of routes leading to the city centre, though there is also an outer and an inner ring road.</p> <p>The main routes to the north of the District follow or link Airedale and Wharfedale and there is also an important network of routes serving Keighley and smaller settlements to the west of the District.</p> <p>There are 1,900km of roads in Bradford District, which it is the responsibility of the Council to maintain.</p> <p>Along these routes there are 400 road bridges, 1,000 retaining walls, 300 footbridges, 57,000 streetlights, 337 traffic signal junctions and pelican crossings and 8,000 illuminated signs / bollards.</p> <p>Bradford has significant air quality problems, mainly attributable to transport.</p>	<p>West Yorkshire Local Transport Plan 2011 – 2026 (LTP3) - Bradford Local Implementation Plan</p> <p>Bradford Local Plan – Core Strategy DPD (July 2017) – Planning for Prosperity: Transport &amp; Movement Chapter</p>
Public Transport (Bus & Rail)	<p>There is an extensive public transport network across the District including a well-used local rail system serving Airedale and Wharfedale and directly linking to Leeds, Calderdale 5 and Greater Manchester.</p> <p>At peak times there is crowding on some rail services and the quality of the rolling stock on the Calderdale line is poor.</p> <p>There is also a high level of bus use throughout the urban area which is encouraged by a generally good quality and high frequency network, though in common with other parts of West Yorkshire bus use has been</p>	<p>West Yorkshire Local Transport Plan 2011 – 2026 (LTP3) - Bradford Local Implementation Plan</p> <p>Bradford Local Plan – Core Strategy DPD (July 2017) – Planning for Prosperity: Transport &amp; Movement</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source
	declining in recent years and there have been some service cuts that have further discouraged the use of buses for travel.				Chapter
<b>Climate and resources</b>					
Air Quality	<p>Since 1999, air quality has been monitored at four locations in Bradford District. There are four declared Air Quality Management Areas (AQMAs):</p> <ul style="list-style-type: none"> <li>- Manningham Lane</li> <li>- Thornton Road</li> <li>- Mayo Avenue/Manchester Road</li> <li>- Shipley Airedale Road</li> </ul> <p>The AQMAs were declared for exceedances of both the annual and hourly objectives for nitrogen dioxide. There are also several areas of concern:</p> <ul style="list-style-type: none"> <li>- Bingley Road</li> <li>- Canal Road, Bradford</li> <li>- Killinghall</li> <li>- Tong Lane</li> </ul>				2017 Air Quality Annual Status Report (ASR) (CBMDC, February 2018)
Per Capita Emissions in Local Authority Areas (KT of CO2)		Bradford	Yorkshire & Humber	England	Local and Regional CO2 Emissions Estimates for 2005-2012 (Ricardo-AEA/DECC, June 2014)
	2005	6.4	10.5	8.5	
	2006	6.3	10.3	8.5	
	2007	6.1	10.0	8.2	
	2008	5.8	9.5	7.9	
	2009	5.3	8.3	7.1	
	2010	5.5	8.9	7.3	
	2011	5.0	8.2	6.7	
	2012	5.2	8.2	7.0	
Water Quality	<p>River quality: There are a number of rivers which flow through the Bradford District. The District is covered by two surface water management catchment areas:</p> <ul style="list-style-type: none"> <li>• Wharfe and Ouse Lower</li> <li>• Aire and Calder</li> </ul> <p>Within these catchment areas there are a number of water bodies of varying quality. The information shows that the water quality is more likely to be poor in the urban areas such as the centre of Bradford, and in the becks to the south of the District which drain toward the Calder catchment. The Aire</p>				Aire and Calder Management Catchment Data Wharfe and Ouse Lower Management Catchment Data

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford			Data source	
	catchment tends to have better water quality until it reaches the confluence with Bradford beck in Shipley. The Wharfe water quality tends to be very good through the north of the District.				
Energy Consumption	Average Domestic Electricity Consumption per Household (kWh)				
		Bradford	Yorkshire & Humber	Great Britain	
	2012	4,007	3,929	4,261	
	2013	3,926	3,847	4,168	
	2014	3,930	3,848	4,162	
	2015	3,880	3,785	4,101	
	2016	3,745	3,678	3,982	
	2017	3,720	3,629	3,921	
	Median Average Domestic Gas Consumption per Household (kWh)				
		Bradford	Yorkshire & Humber	Great Britain	
	2012	14,585	13,248	12,660	
	2013	13,950	12,697	12,218	
	2014	13,536	12,316	11,788	
	2015	13,532	13,644	13,202	
2016	13,323	13,418	13,057		
2017	13,806	12,529	11,949		
Waste	Local Authority Collected Waste in Bradford District (2014/15 to 2017/18)			Local Authority Collected Waste Statistics (DEFRA)	
		Household (Tonnes)	Non-Household (Tonnes)		Total LACW (Tonnes)
	2014/15	197,455	29,191		225,646
	2015/16	204,358	28,905	233,263	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source	
	2016/17	201,190	30,263	231,453		
	2017/18	191,682	30,321	222,003		
	Management of Local Authority Collected Waste (2014/15 to 2017/18)					
		2014/15	2015/16	2016/17		2017/18
	Landfilled	43,366	39,511	17,711		10,095
	Incineration with EFW	66,880	88,521	97,398		114,495
	Incineration without EFW	0	2,623	0		153
	Recycled or Composted	115,791	91,879	92,433		79,753
	Other	-1	10,729	23,919		17,505
	Household Waste Arisings Per Household & Reuse/Recycling/Composting Rates (2014/15 to 2017/18)					
		Residual Household Waste Per Household (kg/household)		% of Household Waste Sent for Re-use, Recycling or Composting		
	2014/15	453.2		51.6%		
	2015/16	579.0		39.9%		
	2016/17	593.3		37%		
2017/18	582.2		34.6%			
Soil	<p>Most of the agricultural land in Bradford consists of improved and semi-improved pastures on the upland fringes of the north-west of the District or the neutral (neither alkaline nor acidic) grasslands to the east and south of the City. Agriculture in Bradford is generally based around rearing stock, mainly sheep, although cattle rearing take place in areas along the river valleys and on the lowlands to the east of the District. Most of the farmland in Bradford District can be described as marginal, constrained by climate and physical topography. Nearly half of the farmland is classed as Grade 4 or 5; that is, land with severe limitations which significantly restricts the range of crops and is mainly suitable for pasture grazing. However, there are also some grade 3 lands made up of alluvial soils along the flood plains of the River Wharfe and River Aire which are more productive</p>					
Hazardous Installations	<p>Within Bradford District there are 8 sites classed as hazardous installations or COMAH establishments, licenced by the HSE.</p>				COMAH Establishments – Public Information (Health & Safety Executive)	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford	Data source
	<p>Sites using chemicals classed as major hazards with significant buffer zone:</p> <ul style="list-style-type: none"> <li>• BASF PLC – Cleckheaton Road, Low Moor, Bradford, BD12 0JZ</li> <li>• Nufarm UK Ltd - Wyke Lane, Wyke, Bradford, BD12 9EJ</li> </ul> <p>Gas Holder sites run by British Gas/Transco:</p> <ul style="list-style-type: none"> <li>• Marley Rd, Keighley,</li> <li>• Peace Street, Bradford</li> <li>• Canal Rd, Bradford</li> </ul> <p>Other:</p> <ul style="list-style-type: none"> <li>• Towler and Staines, Bradford Rd, Keighley (sell bottled gas)</li> <li>• Chellow Water Treatment Works, Haworth Rd, Bradford (Run by Yorkshire Water)</li> <li>• Towler and Staines</li> </ul>	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Table B.2: Summary of key sustainability issues in Bradford

Topics	Sustainability Issues
<p><b>Communities, Population &amp; Housing</b></p> <p><i>[Relevant SEA Topics: Population; Human health; Cultural heritage; and Materials assets]</i></p>	<p><b>Population</b> - Bradford District's overall population is projected to continue to grow (births exceeding deaths), but at a lower projected rate than previously estimated. Continued trend forecast of people leaving Bradford for other parts of the UK – although the population projections for international migration continue to show more people coming to live in Bradford from overseas than emigrating.</p> <p><b>Age Profile</b> - Lower median age (36) compared to England (39.8), and Yorkshire and the Humber Region average (40) and the second lowest in Yorkshire after Leeds (35.5). Bradford has a large proportion of younger people in its population – although this is expected to decline in the future in line with similar trends regionally and nationally. There is also a projected increase in population aged over 65.</p> <p><b>Ethnicity</b> - Bradford District has a diverse ethnic population compared to the region and England as a whole. It has lower levels of people who identify themselves as White British but more who are from Asian or British Asian backgrounds. The area has the largest proportion of people of Pakistani origin in England.</p> <p><b>Crime</b> - Police statistics indicate that the crime rate per 1000 of population (133.59) is higher than comparative areas, force average and other areas in Yorkshire.</p> <p><b>Households</b> - Between 2016 and 2041 a projected fall in household size is predicted within Bradford District, with a reduction from 2.61 to 2.47 persons per household. The number of households in the District, based on current trends, is expected to grow by 8.6%.</p> <p><b>Dwelling tenure and type</b> - In line with the national and regional picture, the largest percentages of dwellings in Bradford District are owner occupied. There is a higher proportion of privately rented dwellings compared to the national average (1.3% more). Bradford District has a lower proportion of detached dwellings than the Yorkshire and Humber region and England. However, the proportion of semi-detached dwellings is similar to the region, but greater than the national average. In comparison, the District has a higher percentage of terraced properties than the regional or national average reflecting historic housing and industrial development.</p> <p><b>Housing prices, affordability and empty units</b> – The average house price is £140,264 which is lower than the West Yorkshire average of £157,921 and well below average for England. This figure however masks significant differences across the District. Viewed as a whole property in Bradford District is more affordable on average than our regional neighbours, with the average house price being 7.12 x average salary compared to 7.47 x average salary across Yorkshire and Humberside. There were 8,751 vacant dwellings in Bradford District in 2017, 3,931 of which had been empty for six months or more. While the number of empty homes in Bradford has declined by 14.8% overall in the five years to 2017, the figure for long-term vacant dwellings has remained stable, rising by 101 to 4,154 from 2013 to 2015 and then falling by 223 to the 2017 total of 3,931,</p> <p><b>Housing standards and delivery</b> - For all stock, Bradford performs better than the English Housing Survey (EHS) England average for excess cold (4% compared to 6%), marginally better for all hazards, but worse for all other indicators. In particular disrepair (8% in Bradford compared to 5% nationally). It is noteworthy that the levels of excess cold are relatively low in Bradford. This has helped to keep the overall Housing Health and Safety Rating System (HHSRS) levels slightly lower than the average for England despite having slightly higher levels of fall hazards.</p> <p><b>Housing Delivery</b> - The level of house building over the last decade peaked in 2007/2008. However, this declined since the onset of the post 2008 economic recession, with the lowest point being reached in 2010/2011. Since 2012/2013, house building has increased in the District returning to similar levels to that experienced in 2006/2007. The percentage of completions on previously developed land in excess existing targets.</p> <p>In terms of affordable housing provision, this has varied in the last few years. The high point was 2013/14 when 279 affordable dwellings were completed, whilst the lowest point saw 92 dwellings completed in 2015/2016. The level of affordable housing completions has been</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Topics	Sustainability Issues
	below existing targets.
<p><b>Health &amp; Inequalities</b>  <i>[Relevant SEA Topics: Population; Human health; and Materials assets]</i></p>	<p><b>Deprivation</b> - Bradford District ranks as the 19<sup>th</sup> most deprived District England. In particular, there are high levels of income and employment deprivation in a number of parts of the area. It will be important to ensure that emerging policies and proposals seek to improve the quality of life for all existing and future residents, particularly in deprived areas, and support community cohesion. The District is the 5<sup>th</sup> most income deprived and 6<sup>th</sup> most employment deprived in England. Income deprivation is focussed in and around central Bradford and Keighley. Other key deprivation measures show higher rates of fuel poverty and child poverty in the area. It will be important to ensure that emerging policies and proposals seek to improve the quality of life for all existing and future residents, particularly in deprived areas, and support community cohesion</p> <p><b>Education &amp; Skills</b> - Despite improvements in educational attainment, qualification levels among Bradford’s working age population are lower than the regional and national averages. This has a knock-on effect on the local economy and the type and nature of employment in the District. Emerging policies and proposals should support opportunities to improve infrastructure for education and access for all existing and future residents.</p> <p><b>Health</b> - the general health of Bradford District’s population tends to be poorer than other parts of the country. This particularly the case in more deprived areas. The main causes of death in Bradford District are the same as other parts of the country – cardiovascular disease, respiratory disease and cancer. People are more likely to die before the age of 75 in the District than elsewhere. This is despite increase life expectancy; although it remains lower than average. It also varies across the area, depending where people live.</p> <p>Obesity is one of the biggest challenges to the health of residents today. It is a particular issue in the Bradford area with income, ethnicity and social deprivation known to have an impact on an individual’s weight. Physical activity rates are below the national average, contributing problems with ill health. Therefore, it will be important for policies should seek to ensure that opportunities are provided for local people to participate in physical activity in order to improve the health and well-being of the area.</p>
<p><b>Economy</b>  <i>[Relevant SEA Topics: Population; Human health; and Materials assets]</i></p>	<p><b>Economic Performance</b> - the District’s economic, its Gross Value Added (GVA), was worth £10.05bn (8.7% of the overall Yorkshire &amp; Humber economy). Whilst GVA continues increases it remains lower than the national and regional averages in terms of growth and GVA per head of population. The economy overall is worth circa £10 billion and is the ninth largest city economy in England. Bradford benefits from above average concentrations of high-value production businesses and employees across food manufacturing, engineering, chemicals, digital technologies, energy and utilities. Bradford productivity per worker at £49,900 is the highest of any city in the Northern Powerhouse. Recent estimates value Bradford’s exports as worth £2bn per year, equating to £10,500 per job.</p> <p><b>Employment/Unemployment</b> - Bradford has lower levels of employment. However, the number of residents in employment continues to increase year-on-year. Unemployment remains above average. There are more people than average in Bradford employed in lower paid elementary occupations and fewer managers and directors than average. Wages in the District reflect the occupation profile of its employed residents and are lower than the national and regional averages.</p> <p>There is a need to ensure that incomes and skill levels are increased, particularly in those areas with high levels of deprivation. Policies and proposals will need to contributing increasing employment prospects for existing and future residents by providing sufficient employment land in the right locations and supporting upskilling and training for local people.</p> <p><b>Business</b> - Bradford has 15,700 businesses employing 200,000 people. The number of businesses has increased by 20 per cent over the last three years, rising faster than Leeds City Region and UK rates of growth. The District has a number of large headquarters including the grocery giant Morrisons, Yorkshire Water, Yorkshire Building Society and Yorkshire’s largest family-owned company JCT600. Bradford based companies employ over 250,000 people across the UK with a combined turnover of over £30 billion. In late 2017, Bradford was named the best city in the UK to start a business by Barclays Bank. Bradford has been identified in Barclays Bank SME Growth Factor</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Topics	Sustainability Issues
	<p>Index as the best place in the country to start up in business, which measures the strength of 12 key growth factors essential to business productivity – including road infrastructure and business churn rate.</p>
<p><b>Natural Environment</b>  <i>[Relevant SEA Topics: Biodiversity; Flora; Fauna; Soil; Water; Air; Climatic factors; Landscape; Cultural heritage; and Materials assets]</i></p>	<p><b>Biodiversity/Designations</b> - The South Pennine Moors represent a significant proportion of heathland in England and show exceptional diversity compared to other examples in the European Union. As a Special Protection Area (SPA) and Special Area of Conservation (SAC), the South Pennine Moors are protected under the European Habitats Directive and European Birds Directive because they contain habitat types which are rare or threatened, and due to the importance of the breeding bird populations.</p> <p>In addition to the SPA and SAC the area also supports a range of wildlife habitats and species. These include a number of nationally identified priority habitats and species as well as number which are considered to locally important. Emerging policies and proposals will need to give consideration to these species and habitats and their integrity. It will also be important to ensure that development in future contributes positively to on-going protection and enhancement of the area’s ecological network.</p> <p><b>Landscape</b> - The landscape is an important feature of the area, forming a key part of its identity. There is a need to ensure that these landscapes are protected and enhanced, particularly those elements that contribute to their distinctive character. Emerging policies and proposals should seek to maximise the benefits from the landscape character assessment to make decisions about the location and design of new development.</p> <p><b>Minerals</b> - Bradford supports a number of mineral resources that do, or have the potential to contribute to supply, with sandstone being the principal mineral extracted in the area. There is a need to safeguard these mineral resources from inappropriate non-mineral development to ensure that they can contribute to maintaining supply. However, in with national policy greater use needs to be made of secondary and recycled to reduce the need for primary mineral extraction.</p> <p><b>Flooding</b> - There are a number of sources of flood risk within Bradford District. The impact of development on water management in the area will need to be taken into account. This should include assessing the risk of flooding, reducing that risk and mitigating its effects. Future development should contribute to reducing flood risk via the provision appropriate drainage infrastructure including the use of Sustainable Urban Drainage Systems (SUDS).</p>
<p><b>Built Environment</b>  <i>[Relevant SEA Topics: Population; Human health; Materials assets; and Cultural heritage]</i></p>	<p><b>Heritage</b> - Bradford District has an array for designated historic assets that contribute local distinctiveness. These assets are highly valued for the positive contribution they make to the quality of the environment as well as the benefits to the local economy and tourism. These important assets include the Saltaire World Heritage Site, 57 Conservation Areas, 2,287 listed buildings, 14 Registered Historic Parks &amp; Gardens and 1 Historic Battlefield Site. It is important that these assets together with their settings are protected and enhanced, and where appropriate their condition improved. Proposals and the design of new development will need to reflect their character, with Conservation Area Appraisals and the Saltaire World Heritage Site Management Plan and guidance used to inform them.</p>
<p><b>Connectivity</b>  <i>[Relevant SEA Topics: Population; Human health; Materials assets; Climatic factors]</i></p>	<p><b>Transport</b> - The District has an extensive road and public transport network that link its communities to one and other and provides access to employment and services for local people. The road network suffers for congestion resulting in poor air quality in a number of locations. Emerging policies and proposals will need to support a reduction in congestion and emissions levels in order to improve air quality (as well as public health), reducing the need to travel by private car to access employment and services and increased opportunities for the use of sustainable transport modes (public transport, walking and cycling).</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Topics	Sustainability Issues
<p><b>Climate &amp; Resources</b>  <i>[Relevant SEA Topics: Biodiversity; Flora; Fauna; Soil; Water; Air; Climatic factors; Landscape; Cultural heritage; and Materials assets]</i></p>	<p><b>Air Quality</b> - poor air quality is a key issue for the Bradford District, and the health of its population. A significant source of pollution is traffic, although other sources also contribute. It is important the air quality is maintained and improved in line with national standards and via the implementation of best practice measures. CO<sub>2</sub> emissions per capita are lower than regional and national levels. Overall, policies and proposals should seek to secure a reduction in emissions from all sources that contribute to poor air quality.</p> <p><b>Water Quality</b> - The quality of the various rivers within the District varies with a number being classed as moderate or poor, thereby not meeting Water Framework Directive (WFD) standards. It is, therefore, important that water quality is improve in order to meet WFD standards, with emerging policies and proposals taking into account impacts on the water environment. Water resources also need to be safeguarded.</p> <p><b>Energy</b> - The consumption of energy within the District is lower than the national and regional averages and fallen overall in recent years. It will be important to ensure that new development, as well as emerging policies and proposals seek to reduce energy consumption through the inclusion of energy efficiency.</p> <p><b>Waste</b> - There is a need to reduce the amount of waste produced from all sources. Where it is produced, it needs to be managed in line with Waste Hierarchy. It is also increasingly viewed as important resource. The amount of Local Authority Collected Waste has shown an overall decline in recent years. Most of this is sent for re-use, recycling or composting. In level of household waste produced has declined, however the amount being re-used, recycled or composted has lower than the national targets. Therefore, it is important that emerging policies and proposals seek to continue support the reduction in waste generated and encourage greater re-use, recycling and composting.</p>

## APPENDIX C

### Consultation Responses and Subsequent Amendments

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
CSPRQ020	I am not happy about Sustainability: It can be construed in many ways and I feel that the report does not holistically cover the impact on each person a decision may have at BMDC. For example it may be sustainable for BMDC to amalgamate two workforces (Refuse with Parks) but the impact is that the services provided are either reduced, not done or are sub-standard. Thus quality is not being sustained (so quality is not sustainable). Nothing is sustainable so please dont use a word that describes some kind of holistic circular approach when it does not work and is especially not used in favour to enhance the livelihood of the common person, only your own staff.	<p>A key purpose of SA/SEA is to determine and evaluate the extent to which options in the Plan, when considered alone and cumulatively, are environmentally, economically and socially sustainable.</p> <p>In terms of potential impacts on local people in Bradford including the provision of services they rely on, this will form an important consideration in the SA when appraising options against SA Objectives including:</p> <p>10. <i>'To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources'</i></p> <p>11. <i>'To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts...'</i></p> <p><b>No changes to the SA Scoping Report needed.</b></p>
CSPRQ051	No particular comments	Noted. <b>No changes to the SA Scoping Report needed.</b>
CSPRQ088	Very poorly done.	Noted. <b>No changes to the SA Scoping Report needed.</b>
CSPRQ024	The ever increasing human population is not sustainable. It is demanded by the capitqalist delusion that you must sell ever more things to ever more people. the capitalist system does not work. Every 20 years or so the whole thing crashes after a brief period of boom and virtually bankrupts the whole country and the people live in poverty for the succeeding twenty years bailing out the mess. Some better system is necessary.	Noted. <b>No changes to the SA Scoping Report needed.</b>
CSPRQ034	If you cannot recycle it then do not use it.	<p>When appraising options and proposals in the Plan against SA Objective 2 'To minimise waste and increase the amount of waste which is re-used, recycled and recovered', rates of recycling/reusing/composting will form a key consideration, as per the indicators presented in the SA Framework.</p> <p><b>No changes to the SA Scoping Report needed.</b></p>
CSPRQ039	don't forget sustainable transport	<p>Impacts of the Plan on sustainable transport, including local people's access to sustainable transport options, will form the primary consideration of appraisals of options against SA Objective 9:</p> <p>9. To develop and maintain an integrated and efficient transport network</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
		<p>which maximises access whilst minimizing detrimental impacts.</p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ046	<p>Comment on the Sustainability Appraisal, which is lacking key elements relating to the historic environment: p.15 Built Environment/ Heritage section - this ignores mention of nationally important Scheduled Monuments. The National Planning Policy Framework also recognises the importance of undesignated heritage assets and their settings &amp; the need for the Planning system to protect them. p.22 Section 12. The term "archaeological" would usefully be added to the statement as in: "Number, or percentage or area of historic building, archaeological [added] sites and areas and their settings (both designated and non-designated) " p.72 Implications for Core Strategy: There is mention here of Listed Buildings &amp; Conservation Areas but no mention of Scheduled Mon, uments or non-designated heritage assets (including archaeological remains)), which have policies designed for their protection in the NPPF.</p>	<p>Noted. The SA Objectives and PPP Review were updated to reflect these requested amendments.</p>
CSPRQ058	<p>Sustainability is subjective. Better to err on the side of caution.</p>	<p>In-line with best practice, the SA/SEA will conform with the precautionary principle i.e. where evidence is lacking to reach a conclusion, a precautionary approach is adopted, and the worst-case scenario is assumed and appropriate measures will be recommended to avoid or mitigate this potential outcome. This is due to be clarified and thoroughly explained in the full SA/SEA appraisal methodology provided in future SA/SEA reports.</p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ106	<p>The current core strategy and the Scoping Report contain many aspirations, but little detailed planning. Specific plans are needed in a number of areas. Examples include: Charging points for electric vehicles. More specific plans are required than in TR1 given that a University of Leeds study has shown that, over a 4 year period, electric vehicles are cheaper to own than diesel, petrol or plug in hybrid vehicles. The major barrier to EV uptake is the provision of charging points, especially for housing with no garage. Waste: the Council has made considerable progress in the treatment of waste and in recycling. More progress is needed in policies to eliminate single use plastics, a commitment to identify, in all cases, the destination and ultimate use of all the Council's recyclates and action on domestic food waste (National Infrastructure Commission Assessment recommends kerbside collection by 2025).Air Quality: Bradford was recently identified by the Government as an air pollution hotspot and has four air quality management areas. What new plans</p>	<p>The purpose of the scoping stage is to establish the scope of SA/SEA i.e. the spatial and temporal scope of the works as well as the baseline data to be used, key sustainability issues and themes as well as topics to be considered during SA/SEA.</p> <p>The SA/SEA will identify and evaluate the sustainability impacts of the Plan in detail at later stages of the programme. For example, when appraising the impacts of the Plan against SA Objective 9 '<i>To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts</i>', it is likely that the appraisal will consider the impacts on the provision and accessibility of electric car charging points.</p> <p>Options and proposals in the Plan will also be appraised in detail against SA Objectives 2 '<i>To minimise waste and increase the amount of waste which is re-used, recycled and recovered</i>', 4 '<i>To safeguard and improve air, water and soil resources</i>', 9 '<i>To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental</i></p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
	<p>does the Council now have to improve air quality in Bradford, not only in the Air Quality Management areas, but throughout the District? How does the Council propose to access the Government funding that is available for this purpose and are there plans to work with the West Yorkshire LES?</p>	<p><i>impacts'</i> and 10 '<i>Reduce congestion and pollution by increasing transport choice and reducing the need to travel by lorry/private car</i>'. Between these objectives, the sustainability impacts of the Plan on waste and air quality will be thoroughly evaluated with recommendations for avoiding and mitigating adverse effects, and enhancing positive effects, provided throughout.</p> <p><b>No changes to the SA Scoping Report needed.</b></p>
<p>CSPRQ108</p>	<p>Needs further review going forward, likely further changes will have occurred when the inspector reviews the document next year?</p>	<p>At each iteration of the SA/SEA, the scoping report and its key elements will be updated as and where necessary. For example, baseline data may be updated with more recent and accurate data. Should any changes be made to the SA/SEA scope, this would be clearly noted and highlighted in the SA/SEA report.</p> <p><b>No changes to the SA Scoping Report needed.</b></p>
<p>CSPRQ110</p>	<p>Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)? Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9. Page 23, section 15 'indicators'. Which document provides evidence of 'More visitors to the District and greater spend' and 'Proportion of the District population undertaking regular physical activity' or has this evidence yet to be gathered?</p>	<p>Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)?</p> <ul style="list-style-type: none"> <li>- This is currently no such document.</li> </ul> <p>Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9.</p> <ul style="list-style-type: none"> <li>- Number of Road Traffic Accidents is already an indicator included in SA Objective 16 '<i>To improve safety and security for people and property</i>'</li> </ul> <p>Page 23, section 15 'indicators'. Which document provides evidence of 'More visitors to the District and greater spend' and 'Proportion of the District population undertaking regular physical activity' or has this evidence yet to be gathered?</p> <ul style="list-style-type: none"> <li>- Visitor data is monitored through Made in Bradford (<a href="http://madeinbradford.co.uk/projects/economic-growth-strategy/">http://madeinbradford.co.uk/projects/economic-growth-strategy/</a>) e.g. 'Bradford attracts over ten million visitors a year with 784,000 visitors staying overnight. Visitor spend amounted to £430 million in 2015'</li> <li>- Physical Activity data is gathered by Born in Bradford (<a href="https://borninbradford.nhs.uk/research/how-to-access-data/">https://borninbradford.nhs.uk/research/how-to-access-data/</a>) and is also monitored by Public Health England (<a href="https://fingertips.phe.org.uk/profile/physical-activity">https://fingertips.phe.org.uk/profile/physical-activity</a>)</li> </ul> <p><b>No changes to the SA Scoping Report needed.</b></p>
<p>CSPRQ111</p>	<p>The scoping report gives no sense of what are core issues and what are not. This is problematic as minor impacts appear to be being</p>	<p>It is necessary for the SEA scoping stage to draw out the 'key sustainability issues'. These are set out in detail for each topic in Table 6.1 of the SA</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
	<p>given equal weight to major ones. In addition there doesn't seem to be a mechanism for evaluating the cumulative affects of impacts or of offsetting positive and negative outcomes/consequences of development. Arguably a sustainability appraisal should deliver an assessment that is equivalent to a cost /benefit analysis (eg in some areas building homes at volume might necessitate substantial investment in costly road infrastructure that does little to support businesses and therefore contributes little to long term economic growth; in another area housing development may require investment in a road but if the road acts as a gateway to the development of land for employment there may be a big economic benefit). Cumulative effects of negative impacts seem to be being ignored or treated as equivalent to a single negative impact.</p>	<p>Scoping Report.</p> <p>It is not necessarily feasible or appropriate to evaluate the key sustainability issues and set them out in a hierarchy of which is most important.</p> <p>It is not intended for these appraisals or for the identification of cumulative effects to be provided at the Scoping stage, but rather subsequent stages in the SA/SEA process will provide a detailed account of the likely cumulative, synergistic and secondary effects of options and proposals in the Plan for each topic against each SA Objective. These appraisals will also provide a robust indication of the likely magnitude of effects. For example, a single site allocation for new homes may result in a minor increase in traffic and thus a minor impact on air quality through this pathway, whereas multiples sites of new homes will have a greater impact on traffic and thus a greater impact on air quality through this pathway.</p> <p><b>No changes to the SA Scoping Report needed.</b></p>
CSPRQ116	<p>"Since the Bradford District is one of poorer health and greater deprivation than the UK average, I think it is important not to allow housing developments and population growth to outpace the available NHS services and support, and the school services. Health and education services, when stretched to their limits, will inevitably result in poorer outcomes than where there is some spare capacity in the services for the population they are serving. Planning decisions seem to be overoptimistic as to how well the local services can cope with the extra people that arrive with large new developments.</p>	<p>The SA/SEA will carefully consider the accessibility of health services and facilities for existing and new local people, including GP surgeries and NHS hospitals. This is included as an indicator, 'Access to services and facilities' for SA Objective 17 '<i>To provide the conditions and services to improve health and well-being and reduce inequality to access to health and social care.</i>'</p> <p><b>No changes to the SA Scoping Report needed.</b></p>
CSPRQ116	<p>I believe the Council should also tighten up the policy on protecting the open green spaces that are so important to both individual and social wellbeing. Planning policy appears to fail to qualify the value of green space. Developers offer the minimum square patch of neatly trimmed grass surrounded by tarmac, concrete, and uninspiring buildings, and with just a few token spindly saplings to replace beautiful mature trees felled to make room for the development. The replacement green patch, if it meets the required area, seems to be assessed as having the same value as mature trees, dry stone walls, babbling brooks and thriving wildlife of high biodiversity. Green space should be given a score as to its value in terms of public enjoyment and benefit to health and wellbeing, and then given the appropriate degree of protection.</p>	<p>As a result of the Scoping stage, appraisals carried out in the SA/SEA will carefully consider the impacts of proposals and options being considered for the Plan on open spaces and green spaces due to their value in terms of community cohesion, biodiversity, landscape and townscape character and the setting of heritage assets and historic areas. Where potential adverse effects are identified, recommendations will be made to help avoid or mitigate these.</p> <p><b>No changes to the SA Scoping Report needed.</b></p>
CSPRQ116	<p>Air quality is going to be of increasing concern and importance, and I think the Council needs to identify, as a matter of priority, the green</p>	<p>Air quality will be a key consideration during the SA/SEA. Individual and cumulative impacts of all options and proposals on air quality will be</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
	<p>wedges and corridors within and at the edge of the urban areas, that contribute positively and significantly to the flow of clean fresh air into the towns and cities, and which help to remove polluted air. Also it is important to recognize the value of trees in the urban environment in being able to absorb pollutants, and to increase the community's enjoyment and physical and mental health. Urban trees need to be given greater protection.</p>	<p>accounted for in detail and thoroughly when identifying and evaluating the likely effects on SA Objectives 4 '<i>To safeguard and improve air, water and soil resources</i>' and 10 '<i>Reduce congestion and pollution by increasing transport choice and reducing the need to travel by lorry/private car</i>'.</p> <p>The value of trees and other green infrastructure elements will form an important consideration in terms of avoiding and mitigating impacts on air quality. The protection and enhancement of the network of trees in Bradford will be an important consideration when appraising Options against SA Objective 5 '<i>To conserve and enhance the internationally, nationally and locally valued wildlife species and habitats</i>'.</p> <p><b>No changes to the SA Scoping Report needed.</b></p>
<p>CSPRQ116</p>	<p>Landscape Character Areas should also be given more protection.</p>	<p>Landscape Character Areas within and coincident with the Borough are identified in the Baseline Information, as presented in Appendix B of the Scoping Report. This baseline information is transposed into the SA Framework and so appraisals of options against SA Objective 6 '<i>To maintain, protect and enhance the character of area's natural and man-made landscapes</i>' would include consideration of how development conforms with landscape character areas.</p> <p><b>No changes to the SA Scoping Report needed.</b></p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (non-questionnaire)	Arcadis Response and changes made to SA/SEA
CSPR003	We do not have any comments to make regarding the Health Impact Assessment Scoping Report	Noted. No changes to the SA Scoping Report needed.
CSPR004	<ul style="list-style-type: none"> <li>Table 7.2, SA Objective 12 - Object - It would be preferable if this SA Objective reflected the terminology used in the NPPF.</li> <li>Table 7.2, SA Objective 12 amend to read:- “To conserve and, where appropriate, enhance the significance of heritage assets and their setting”</li> <li>Appendix A, International Policies - Object - For completeness, this Section should also include the following: UNESCO World Heritage Convention</li> <li>Appendix A, Local Policies - Object - For completeness, this Section should also include the following: Saltaire World Heritage Site Management Plan</li> </ul>	<p>SA Objective on cultural heritage has been reworded to “To conserve and, where appropriate, enhance the significance of heritage assets and their setting”</p> <p>Appendix A PPP Review has been updated to include the UNESCO World Heritage Convention as well as the Saltaire World Heritage Site Management Plan.</p>
CSPR019	Craven District Council has no specific comment to make in this regard.	Noted. No changes to the SA Scoping Report needed.
CSPR031	<p>We are pleased to see and have undertaken initial discussions with Bradford Council regarding the scope of the SFRA update. Following these discussions we are able to offer technical advice regarding the development of the SFRA outside of the statutory consultation process and are happy to continue discussions to agree what service we can offer and when this is needed to develop the SFRA.</p> <p>We also support that core strategy policy EN7 – Flood Risk may also need to be updated subject to the SFRA review.</p>	Noted. No changes to the SA Scoping Report needed.
CSPR045	<p>Natural England broadly welcomes the report and has the following comments to make.</p> <p>We recommend that that protected species and ancient woodland should be considered in the indicators under objective 5 To conserve and enhance the internationally, nationally and locally valued wildlife species and habitats.</p> <p>We welcome the identified plans and programmes in Appendix A but suggest that you also consider the following:</p> <ul style="list-style-type: none"> <li>South Pennine Moors Site Improvement Plan. Available online at: <a href="http://publications.naturalengland.org.uk/publication/5412834661892096">http://publications.naturalengland.org.uk/publication/5412834661892096</a></li> <li>The Nidderdale AONB Management Plan. Available online at: <a href="https://nidderdaleaonb.org.uk/">https://nidderdaleaonb.org.uk/</a></li> </ul>	<p>Protected species and Ancient woodland have been included as indicators under the SA Objective on biodiversity.</p> <p>Appendix A PPP Review has been amended to include the following:</p> <ul style="list-style-type: none"> <li>South Pennine Moors Site Improvement Plan</li> <li>The Nidderdale AONB Management Plan</li> <li>Natural Environment and Rural Communities Act 2006</li> <li>Defra Rights of Way Circular 01/09</li> <li>Bradford Rights of Way Improvement Plan</li> <li>Bradford Biodiversity Action Plan</li> <li>National biodiversity climate change vulnerability model</li> </ul>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (non-questionnaire)	Arcadis Response and changes made to SA/SEA
	<ul style="list-style-type: none"> <li>• Natural Environment and Rural Communities Act 2006. Available online at: <a href="http://www.legislation.gov.uk/ukpga/2006/16/contents">http://www.legislation.gov.uk/ukpga/2006/16/contents</a></li> <li>• Defra Rights of Way Circular 01/09. Available online at: <a href="https://www.gov.uk/government/publications/rights-of-way-circular-1-09">https://www.gov.uk/government/publications/rights-of-way-circular-1-09</a></li> <li>• Bradford Rights of Way Improvement Plan. Available online at: <a href="https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/rights-of-way-improvements/">https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/rights-of-way-improvements/</a></li> <li>• Bradford Biodiversity Action Plan. Available online at: <a href="https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/biodiversity/">https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/biodiversity/</a></li> <li>• National biodiversity climate change vulnerability model. Available online at: <a href="http://webarchive.nationalarchives.gov.uk/20140605090108/http://naturalengland.org.uk/ourwork/climateandenergy/climatechange/vulnerability/nationalvulnerabilityassessment.aspx">http://webarchive.nationalarchives.gov.uk/20140605090108/http://naturalengland.org.uk/ourwork/climateandenergy/climatechange/vulnerability/nationalvulnerabilityassessment.aspx</a></li> </ul>	

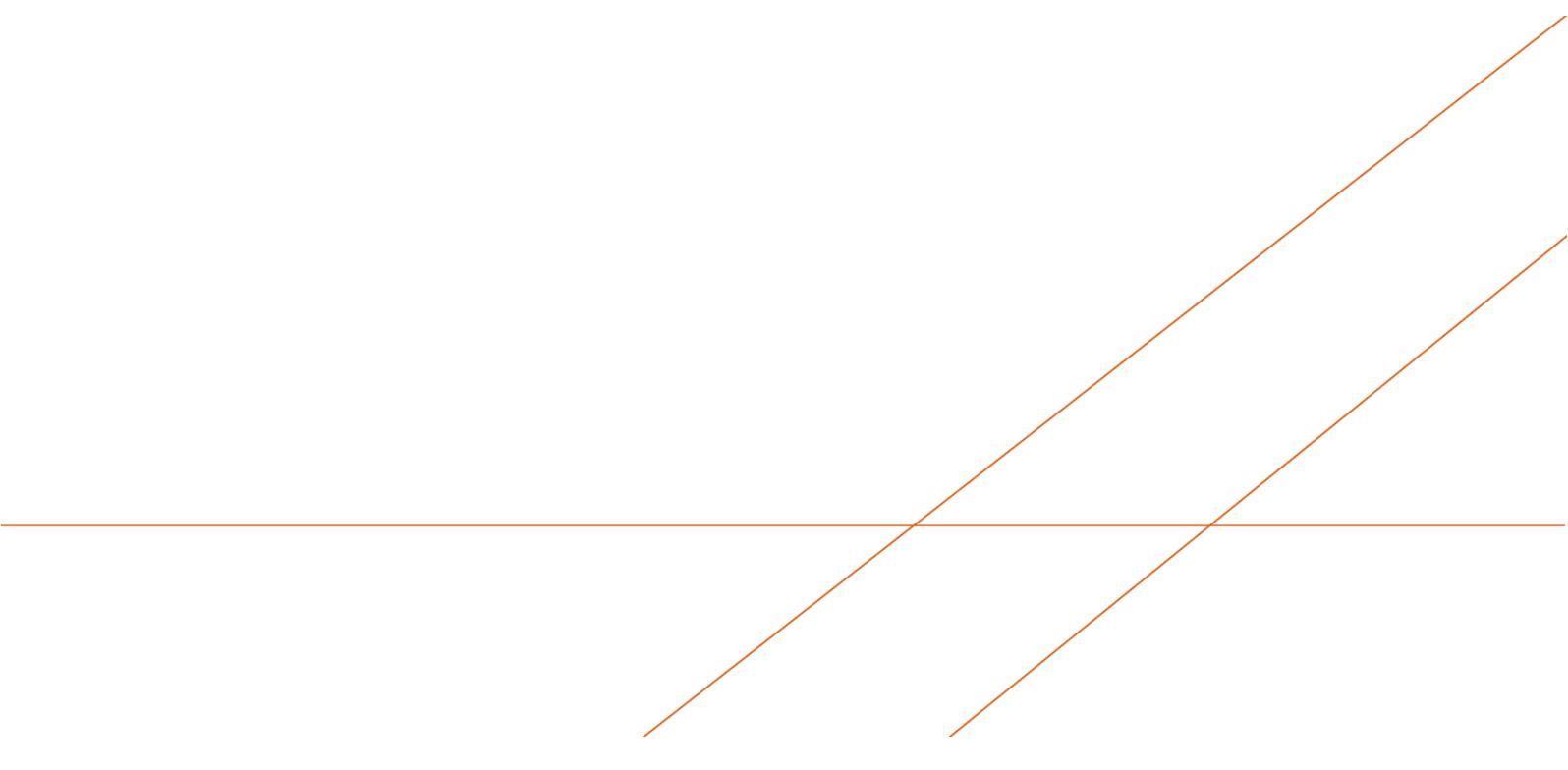
## **APPENDIX D**

### **Assessments of Policies**

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# APPENDIX D

## Policies Assessments

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## Assessment Rationale

This appendix presents the results of the assessment of options being considered for the CSPR, including preferred options and their reasonable alternatives. Table D-1 lists the options assessed in this appendix, including the preferred options and the reasonable alternatives. Reasonable alternatives were only available and identified for new policies or policies under review. Policies from the adopted Core Strategy that are not under review and subsequently do not have any reasonable alternatives, are in blue.

*Table D-1: Policy options assessed in this appendix. Options in blue are from the adopted Core Strategy and are not under review*

Assessment Table: Presumption in Favour of Sustainable Development
<b>P1</b> Presumption in Favour of Sustainable Development (not under review)
Assessment Table: Strategic Core Policies 1 - 5
<b>SC1</b> Overall Approach and Key Spatial Priorities Preferred Option - SC1 Reasonable Alternative 1
<b>SC2</b> Climate Change and Resource Use Preferred Option - SC2 Reasonable Alternative 1 - SC2 Reasonable Alternative 2 - SC2 Reasonable Alternative 3
<b>SC3</b> Working together to make Great Places (not under review)
<b>SC4</b> Hierarchy of Settlements (not under review)
<b>SC5</b> Location of Development Preferred Option - SC5 Reasonable Alternative 1 - SC5 Reasonable Alternative 2 - SC5 Reasonable Alternative 3 - SC5 Reasonable Alternative 4
Assessment Table: Strategic Core Policies 6 - 10
<b>SC6</b> Green Infrastructure Preferred Option - SC6 Reasonable Alternative 1 - SC6 Reasonable Alternative 2 - SC6 Reasonable Alternative 3
<b>SC7</b> Green Belt Preferred Option - SC7 Reasonable Alternative 1 - SC7 Reasonable Alternative 2 - SC7 Reasonable Alternative 3
<b>SC8</b> Protecting the South Pennine Moors and their Zone of Influence (not under review)
<b>SC9</b> Making Great Places (not under review)
<b>SC10</b> Healthy Places Preferred Option (new policy) - SC10 Reasonable Alternative 1 - SC10 Reasonable Alternative 2 - SC10 Reasonable Alternative 3
Assessment Table: Sub Area Policies
<b>BD1</b> City of Bradford including Shipley and Lower Baildon - BD1 Reasonable Alternative 1
<b>BD2</b> Investment priorities for the City of Bradford including Shipley and Lower Baildon (no Reasonable Alternatives available)
<b>AD1</b> Airedale - AD1 Reasonable Alternative 1
<b>AD2</b> Investment Priorities for Airedale (not under review)
<b>WD1</b> Wharfedale - WD1 Reasonable Alternative 1
<b>WD2</b> Investment Priorities for Wharfedale (not under review)
<b>PN1</b> South Pennine Towns and Villages - PN1 Reasonable Alternative 1
<b>PN2</b> Investment Priorities for the Pennine Towns and Villages Sub Area (not under review)
Assessment Table: Planning for Prosperity: Economy
<b>EC1</b> Creating a successful and competitive Bradford District economy within the Leeds City Region Preferred Option - EC1 Reasonable Alternative 1
<b>EC2</b> Employment land, Jobs and Skills Requirements (no Reasonable Alternatives available)

<b>EC3</b> Employment and Skills Delivery Preferred Option - EC2 Reasonable Alternative 1 - EC2 Reasonable Alternative 2
<b>EC4</b> Sustainable Economic Growth (not under review)
<b>EC5</b> City, Town, District and Local Centres (no Reasonable Alternatives available)
Assessment Table: Planning for Prosperity: Transport
<b>TR1</b> Travel Reduction and Modal Shift Preferred Option - TR1 Reasonable Alternative 1
<b>TR2</b> Parking Policy (not under review)
<b>TR3</b> Integrating Sustainable Transport and Development
<b>TR4</b> Transport and Tourism (not under review)
<b>TR5</b> Strategic Transport Priorities (no Reasonable Alternatives available)
<b>TR6</b> Freight (not under review)
<b>TR7</b> Transport Investment and Management Priorities (not under review)
<b>TR8</b> Aircraft Safety (not under review)
Assessment Table: Planning for People: Housing
<b>HO1</b> Scale of Housing Required Preferred Option - HO1 Reasonable Alternative 1 - HO1 Reasonable Alternative 2
<b>HO2</b> Strategic Sources of Supply Preferred Option - HO2 Reasonable Alternative 1
<b>HO3</b> Distribution of Housing Requirement Preferred Option - HO3 Reasonable Alternative 1 - HO3 Reasonable Alternative 2 - HO3 Reasonable Alternative 3 - HO3 Reasonable Alternative 4 - HO3 Reasonable Alternative 5 - HO3 Reasonable Alternative 6
<b>HO4</b> Managing Housing Delivery Preferred Option - HO4 Reasonable Alternative 1 - HO4 Reasonable Alternative 2
<b>HO5</b> Density of Housing Schemes Preferred Option - HO5 Reasonable Alternative 1
<b>HO6</b> Maximising use of Previously Developed Land (no Reasonable Alternatives available)
<b>HO7</b> Housing Site Allocation Principles (not under review)
<b>HO8</b> Housing Mix Preferred Option - HO8 Reasonable Alternative 1 - HO8 Reasonable Alternative 2
<b>HO9</b> Housing Quality Preferred Option - HO9 Reasonable Alternative 1 - HO9 Reasonable Alternative 2
<b>HO10</b> Overcrowding and Vacant Homes (not under review)
<b>HO11</b> Affordable Housing Preferred Option - HO11 Reasonable Alternative 1 - HO11 Reasonable Alternative 2
<b>HO12</b> Provision of Sites for Gypsies, Travellers and Travelling Showpeople Preferred Option - HO12 Reasonable Alternative 1 - HO12 Reasonable Alternative 2
Assessment Table: Planning for Place: Environment
<b>EN1</b> Open Space, Sports and Recreational (not under review)
<b>EN2a</b> Biodiversity and Geodiversity Preferred Option - EN2a Reasonable Alternative 1 - EN2a Reasonable Alternative 2 - EN2a Reasonable Alternative 3
<b>EN2b</b> Biodiversity and Geodiversity Preferred Option - EN2b Reasonable Alternative 1 - EN2b Reasonable Alternative 2
<b>EN3</b> Historic Environment (not under review)
<b>EN4</b> Landscape (not under review)
<b>EN5</b> Trees and woodlands (no Reasonable Alternatives available)
<b>EN6</b> Energy Preferred Option - EN6 Reasonable Alternative 1
<b>EN7</b> Flood Risk (no Reasonable Alternatives available)
<b>EN8</b> Environmental Protection Policy (no Reasonable Alternatives available)

Assessment Table: Planning for Place: Minerals
<b>EN9</b> New Minerals Extraction Sites (not under review)
<b>EN10</b> Sandstone Supply (not under review)
<b>EN11</b> Sand, Gravel, Fireclay and Coal Supply (not under review)
<b>EN12</b> Minerals Safeguarding (not under review)
Assessment Table: Planning for Place: Waste Management
<b>WM1</b> Waste Management (not under review)
<b>WM2</b> Waste Management (not under review)
Assessment Table: Planning for Place: Design
<b>DS1</b> Achieving Good Design (not under review)
<b>DS2</b> Working with the Landscape (not under review)
<b>DS3</b> Urban character (not under review)
<b>DS4</b> Streets and Movement (not under review)
<b>DS5</b> Safe and Inclusive Places (not under review)
Assessment Table: Planning for Place: Implementation and Delivery Policies
<b>ID1</b> Development Plan Documents and Authority Monitoring Report (not under review)
<b>ID2</b> Viability (no Reasonable Alternatives available)
<b>ID3</b> Developer Contributions (not under review)
<b>ID4</b> Working with Partners (not under review)
<b>ID5</b> Facilitating Delivery (not under review)
<b>ID6</b> Simplification of Planning Guidance to Encourage Sustainable Development (not under review)
<b>ID7</b> Community Involvement (not under review)
<b>ID8</b> Regeneration Funding and Delivery (not under review)

The assessment is a prediction and evaluation of the likely effects of options on each SA Objective of the SA Framework. The SA Framework provides indicators for each SA Objective that help to guide the decision-making over whether options would make a negative or positive contribution towards each SA Objective.

Table D-2 details the rationale behind the assessment. In line with requirements of the SEA Directive (particularly Annex 2(II) and Annex 1(f), the following characteristics of effects are predicted and evaluated:

- Probability;
- Duration, including short-, medium- and long-term effects;
- Frequency
- Reversibility;
- Cumulative and synergistic nature;
- Transboundary nature;
- Secondary nature;
- Permanent or temporary nature; and
- Positive or negative nature.

Table D-2: Rationale behind the appraisals of options

Characteristic	Rationale
Format	<p>The appraisals are presented in tables (see Table D-1). Where appropriate, options and policies are grouped together in the same assessment table. The rationale for this is as follows:</p> <ul style="list-style-type: none"> <li>• Policies are grouped together in the Local Plan;</li> <li>• Policies under the same theme in the Plan, such as ‘Transport’ policies, are likely to result in similar effects on a number of indicators. Grouping the appraisals together facilitates less repetition of text, saving space and reducing the need for a paperpurchase for readers;</li> <li>• Grouping appraisals together facilitates a more holistic appreciation of the likely cumulative effects of the Plan and the overall impact of all policies in-</li> </ul>

Characteristic	Rationale
	<p>combination. Policies in the Plan are not going to be adopted in isolation; and</p> <ul style="list-style-type: none"> <li>Grouping policies and options together facilitates a comparison of the likely impacts of options vs their reasonable alternatives.</li> </ul> <p>The assessment text for SA Objectives 9 and 10, on air quality and transport, and the assessment text for SA Objectives 11, 12 and 13 on accessibility of services, community cohesion and culture/recreation, have also been grouped together. This is because the indicators used in the assessment for the grouped together SA Objectives are largely similar and grouping them together in this way saves space and avoids unnecessary repetition. Whilst the summary of effects text is grouped together, separate scores and characteristics of effects are provided for all SA Objectives. An appraisal is provided for every single option and alternative against every SA Objective. The predicted effects are evaluated for their probability, geographical extent, reversibility, permanence, magnitude and significance.</p> <p>The assessment text is intended to be comprehensive, robust and to satisfy the technical requirements of SA and SEA whilst also being accessible for the general public and avoiding unwieldy and excessively long tables or appendices. For this purpose, the writing style of assessment text adopts a slightly shorthand approach.</p> <p>The following symbol is used during the appraisal text: '→'. This is predominantly intended to mean 'would lead to'.</p> <p>For example, an impact of a policy on GHG emissions might usually read:</p> <p><i>“Policy P1 would be likely to enhance public transport options for people in Bradford. This would be likely to lead to a reduction in GHG emissions from the transport sector.”</i></p> <p>For such an impact, the shorthand style of assessment text would read:</p> <p><i>“P1 → enhanced public transport → reduction in GHG emissions from transport”.</i></p>
Probability	<p>There is an inherent degree of uncertainty in appraisals carried out in SA. Should it be adopted, the CSPR would likely be in force for several years, over which time could potentially arise unforeseen circumstances as baseline data unexpectedly changes.</p> <p>For example, any given community facility in Bradford could potentially close down or move within a period of months, and thus an assessment which considers that a CSPR policy would provide new residents with good access to this facility pre-development, may not do so by the time construction begins. These circumstances are impossible to predict. The planning system is generally robust enough to deal with such changes by re-assessing the needs of sites/communities at the time applications are made.</p> <p>Uncertainties are dealt with in SA by adopting a precautionary approach, wherein the worst-case scenario is assumed unless reliable evidence suggests otherwise.</p> <p>Assessment tables include a column indicating whether there is considered to be a Low, Medium or High probability of the effect taking place.</p> <p>Where the recorded effect is 'uncertain', the probability is recorded as 'Low'.</p> <p>Where the recorded effect is 'neutral/negligible', the probability is recorded as 'High'. This is because a precautionary approach is adopted and, as such, unless there is a high probability of the effect being neutral/negligible then the worst-case scenario is assumed.</p> <p>Probability is an evaluative judgment of the SEA/SA experts carrying out the appraisals.</p>
Duration and short-, medium- and long-term effects	<p>Assessment tables include a column indicating whether the effects are considered to be Short-, Medium- or Long-term.</p> <ul style="list-style-type: none"> <li>Short-term effects reside for 0-10 years after Plan adoption;</li> <li>Medium-term effects reside for 10-20 years after Plan adoption; and</li> <li>Long-term effects last beyond the Plan period.</li> </ul> <p>Effects can be multiple terms, such as arising in the short-term and residing in the long-term. In the assessment tables, the longest term is used to indicate the duration i.e. the</p>

Characteristic	Rationale
	assessment indicates the duration of the effect but not necessarily when it will initially arise.
Reversibility	<p>Assessment tables include a column indicating whether effects are considered to be reversible or irreversible. The intention is not to suggest whether or not the effect is going to be intentionally reversed, but rather to indicate if it is theoretically possible that the effect could be reversed.</p> <p>R = Reversible; and IR = Irreversible.</p> <p>The majority of effects caused by the Plan would typically be reversible.</p>
Permanent and temporary	<p>The assessment tables include a column to indicate whether the identified effects are considered to be permanent or temporary:</p> <p>T = temporary; and P = permanent.</p> <p>Should the Plan be adopted, it would only be in place for the Plan period and would subsequently be replaced by a new Plan. Many of the effects of policies in the proposed Plan are therefore typically temporary effects. However, it is possible for some effects to be permanent, such as if a policy were to result in new development on a greenfield site - that land will now always be previously developed land and any loss of soils from the site is considered to be permanent.</p>
Positive & negative effects and significance	<p>The assessments identify and evaluate the sustainability effects of all policies in the Plan, including positive, negative and neutral effects. The range of predicted effects includes:</p> <ul style="list-style-type: none"> <li>• Major positive - The proposal significantly contributes to the achievement of the SA Objective;</li> <li>• Minor positive - The option contributes partially to the achievement of the SA Objective;</li> <li>• Uncertain – It is not possible to determine the nature of the impact;</li> <li>• Neutral - Relationship between the option and the SA Objective is negligible;</li> <li>• Positive/negative – A combination of positive and negative contributions to the SA Objective;</li> <li>• Minor negative - The option partially detracts from the achievement of the SA Objective;</li> <li>• Major negative effects - The proposal significantly detracts from the achievement of the SA Objective.</li> </ul> <p>For the purpose of the SEA Directive, effects noted as ‘major adverse’ or ‘major positive’ are considered to be ‘significant’. The SEA directive necessitates a focus on ‘significant’ effects. Determining whether an effect is significant or minor is an evaluative judgment based on expert opinion, best practice and industry standards. It is also guided by Annex II (2) of the SEA Directive, which states:</p> <ul style="list-style-type: none"> <li>• <i>“The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</i></li> <li>• <i>The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;</i></li> <li>• <i>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,</i></li> <li>• <i>Environmental problems relevant to the plan or programme; and</i></li> </ul> <p><i>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water</i></p>

Characteristic	Rationale														
	<p><i>protection).</i>”</p> <p>Minor effects (i.e. insignificant effects) are also identified. This is because identifying minor effects assists with the identification of cumulative and synergistic effects (e.g. several minor effects combined to have a significant effect), can help to identify opportunities for enhancements (e.g. enhancing a minor positive effects to make it significant) and also better enables the Council to make a more informed decision over the sustainability performance of options.</p> <p>A positive effect would typically be one where the Plan proposal would be likely to contribute towards the aims of the SA Objective, whereas an adverse effect would be one where the Plan proposal conflicts with the Objective. Typically, if a proposal would be expected to have a positive effect(s) to the same extent that it would have an adverse effect(s), a +/- score is awarded. However, if it is considered to be likely that the adverse effect(s) would be of a notably greater magnitude than the positive effect(s), then an adverse score is awarded in-line with the precautionary principle.</p> <p>Assessments carried out in SEA operate at a very high level and so the results for options and alternatives that are only slightly different to one another can appear very similar. It might be that one option would have an effect that is of a slightly greater magnitude than the effect of another option, but the effects of both options are both significant and so they would both receive the same score.</p> <p>The assessment tables include a column that displays an overall score for each policy against each SA Objective that indicates the overall effect, as follows:</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th style="background-color: #f1c40f;">Major negative</th> <th style="background-color: #f1c40f;">Minor negative</th> <th style="background-color: #f1c40f;">Neutral / negligible</th> <th style="background-color: #f1c40f;">Positive &amp; negative</th> <th style="background-color: #f1c40f;">Uncertain</th> <th style="background-color: #f1c40f;">Minor positive</th> <th style="background-color: #f1c40f;">Major positive</th> </tr> </thead> <tbody> <tr> <td style="background-color: #e74c3c; color: white;">--</td> <td style="background-color: #f1c40f;">-</td> <td style="background-color: #f1c40f;">0</td> <td style="background-color: #2980b9; color: white;">+/-</td> <td style="background-color: #f1c40f;">?</td> <td style="background-color: #2ecc71; color: white;">+</td> <td style="background-color: #2ecc71; color: white;">++</td> </tr> </tbody> </table>	Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive	--	-	0	+/-	?	+	++
Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive									
--	-	0	+/-	?	+	++									
Frequency	All effects of the Plan are considered to occur once, unless indicated otherwise.														
Cumulative nature and synergistic effects	<p>This SA provides an appraisal of all policies in the Plan. These policies are not going to be adopted in isolation and so it is important to identify and evaluate the cumulative impacts of all policies in-combination. A cumulative effects appraisal has also been carried out for this purpose. Cumulative and synergistic effects are defined as follows:</p> <ul style="list-style-type: none"> <li>• Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect; and</li> <li>• Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts.</li> </ul> <p>The cumulative effects assessment in this report accounts for both cumulative and synergistic effects.</p>														
Transboundary nature	The assessment table includes a column to indicate the likely geographical extent of effects. In most cases this extent is 'Bradford District', however, where effects would be likely to be discernible in neighbouring authorities or at a scale greater than Bradford, this is specified.														
Secondary effects	<p>The assessment process inherently includes a consideration of secondary effects. The assessment text avoids specifically signposting whether the identified effect is primary or secondary.</p> <p>Secondary effects are defined as follows:</p> <p><i>Secondary effects are effects that are not a direct result but occur away from the original effect or as a result of a complex pathway.</i></p>														
Baseline trends	For each SA Objective an analysis of the baseline data gathered during the SA Scoping has been carried out to determine the likely future baseline trends. This indicates whether														

Characteristic	Rationale		
	the baseline is currently improving, declining or static with regards to moving towards the SA Objectives as per the following key.		
	Declining	Static	Improving
Recommendations	<p>Alongside the assessment results recommendations are made. These are measures which, if adopted, would be likely to help avoid or minimise negative impacts or to enhance positive impacts. The SA seeks to make recommendations in all cases where negative impacts have been identified – where this is not feasible it is explained in the assessment boxes.</p> <p>It is considered that policies not under review are unlikely to be able to incorporate recommendations and as such recommendations have only been made for policies that are under review.</p>		

It is important to note that the assessment results in this appendix are the assessments of individual policies and so they do not factor in the likely mitigating impact of other policies proposed in the CSPR. For example, policy HO1 establishes the housing requirement for the District. The assessment of HO1 predicted a range of potentially negative sustainability impacts associated with the construction and occupation of these homes, such negative impacts on the Biodiversity & Geodiversity SA Objective caused by new development on greenfields, direct losses of habitats, reduced ecological connectivity and increase recreational pressure on green spaces. It is likely that these potential negative impacts would be mitigated to some extent by other policies proposed in the CSPR, such as policies EN2a: Biodiversity & Geodiversity and EN2b: Biodiversity & Development, which seek to protect and enhance the District’s biodiversity. This is taken into consideration in detail in the cumulative effects assessment.

Table D-3 provides a summary of the policies proposed in the CSPR that would be likely to help avoid or mitigate negative impacts, or to enhance positive impacts, identified for each SA Objective.

*Table D-3: Summary of policies that would likely avoid, mitigate or enhance effects for each SA Objective*

SA Objective	Mitigating Policies
1. Energy and GHGs	<p>Policy SC2 and EN6 would support the use of renewable and low carbon energy in the District which would reduce the energy consumption and GHG emissions from traditional energy sources.</p> <p>Policies TR1, TR3, TR7, DS4, SC2-SC5, SC9 and SC10 would support the provision and uptake of sustainable and active travel opportunities in the District which would contribute to reducing vehicular GHG emissions.</p> <p>Policies SC1, SC2, SC6, SC9, SC10, EN1 and EN2 would protect and enhance GI and greenspaces within the District which would ensure the protecting and growth of the District’s carbon sink.</p> <p>Policy EN8 would require development to mitigate and offset emissions and impacts in accordance with the Low Emission Strategy for Bradford.</p> <p>HO7 encourages site allocations that provide opportunities for low carbon and renewable energy sources.</p>
2. Waste	<p>Policies WM1 and WM2 support the provision of waste disposal and recycling facilities in Bradford. The policies would encourage recycling, reusing and composting and would be highly likely to reduce the amount of waste sent to landfill.</p> <p>Policies SC2 and HO10 would support the reuse of PDL and existing housing stock which would reduce waste produced through construction.</p> <p>SC9 and SC10 would encourage the efficient use of land and materials and reduce waste</p>

SA Objective	Mitigating Policies
	<p>generated from construction.</p> <p>Policy HO9 would require strategic housing developments to incorporate appropriate waste management and recycling facilities.</p>
3. Land & Buildings	<p>Policies SC2, SC5 and HO10 would support the reuse of PDL and existing housing stock which would reduce waste produced through construction. HO6 also gives priority to the re-use of PDL and buildings and sets targets for delivery on PDL.</p> <p>Policies SC6, EN1, EN2a, EN2b, EN4 and EN5 would protect and enhance greenspaces in the district.</p> <p>HO5 seeks to maximise densities and so could reduce the need for land.</p> <p>HO7 encourages site allocations that reclaim derelict land.</p>
4. Climate Change Resilience	<p>Policies SC1 and SC2 would seek to reduce and manage flood risk in the District.</p> <p>Policy SC10 would require development proposals to include measures that would mitigate the effects of climate change.</p> <p>Policies SC1, SC2, SC6, SC8, EN1, EN2a, EN2b and EN5 would protect and enhance greenspaces and habitats within the District which would preserve vegetation and permeable soils which would contribute to sustainable flood risk management.</p> <p>HO7 encourages site allocations that minimise negative impacts on flood risk.</p> <p>Sub-area policy BD1 commits to enhancing GI cover in the local sub-area to reduce flood risk.</p> <p>Policy EN7 would increase flood storage, implement SUDs and GI within developments, and actively manage flood risk.</p>
5. Water resources	<p>Policy SC2 would ensure new developments use water resources sustainably, minimising consumption and maximising water recycling.</p> <p>Sub-area policy AD2 would ensure local investment directed towards working with Yorkshire Water and the EA, to ensure water and wastewater infrastructure requirements are provided for.</p> <p>EN7 would seek to minimise run off from developments and enhance the ecological value of beck corridors.</p> <p>Policy EN8 would safeguard ground and surface water quality and protect and improve quality, quantity and ecological status of water in Bradford.</p>
6. Biodiversity & Geodiversity	<p>Policies SC1, SC2, SC6, SC8 and EN1-EN8 would seek to protect, enhance and develop greenspaces and sensitive habitats within the District.</p> <p>Policies SC4, DS2 and DS3 would ensure the inclusion of green infrastructure in the design of development.</p> <p>HO7 encourages site allocations that create opportunities for enhancing GI and minimise negative impacts on biodiversity, as well as maximising opportunities for enhancing biodiversity.</p> <p>Sub-area policies BD2, WD2, AD2 and PN2, and policies SC9 and SC10 would protect and enhance GI in developments which would contribute to improvements in ecological connectivity across the District.</p>
7. Landscape & Townscape	<p>Policies SC6, SC8 and EN1- EN8 would protect, enhance and develop the landscapes and character in the District.</p> <p>Policies SC1 and DS1-DS5 would ensure the high-quality design of developments that would protect, complement and enhance the character of surrounding areas.</p> <p>Policy SC4 would seek to develop a strong sense of place and a high-quality public realm in the District.</p> <p>HO7 encourages site allocations that relate well to the form and character of the settlement and do not detract from setting.</p>

SA Objective	Mitigating Policies
	<p>Sub-area policy PN2 would work with partnerships to protect and enhance the character of natural landscapes in Pennine Towns and Villages.</p> <p>Sub-area policies, BD1, AD1, WD1 and PN1 would ensure that new developments, within the local sub-areas would be of high-quality design that respects, protects and enhances the local character and setting.</p> <p>Policies HO8 and HO9 would help to ensure that new housing is in-keeping with the existing build form in the surrounding area in order to protect local character and setting.</p>
8. Cultural Heritage	<p>Policies SC1 and EN3 - EN5 would protect and enhance the District's historic character.</p> <p>Policies SC9, SC10 and DS1-DS5 would ensure the high-quality design of developments that would protect, complement and enhance the character and historic setting of the District.</p> <p>Sub-area policy PN2 would work with partnerships to protect and enhance the character of distinctive heritage assets and landscapes in Pennine Towns and Villages.</p> <p>HO7 encourages site allocations that relate well to the form and character of the settlement and do not detract from setting.</p> <p>Sub-area policies, BD1, AD1, WD1 and PN1 would ensure that new developments, within the local sub-areas would be of high-quality design that respects, protects and enhances the local character and setting</p> <p>Policy TR4 would improve accessibility of visitor attractions including heritage assets and support the development and maintenance of attractions, such as heritage railways.</p> <p>Policies HO8 and HO9 would help to ensure that new housing is in-keeping with the existing build form in the surrounding area in order to protect local character and setting.</p>
9. Air Quality	<p>Policy EN6 would support the use of renewable and low carbon energy in the District which would reduce the air pollution from traditional energy sources.</p> <p>HO7 encourages site allocations that reduce the need to travel and are accessible via quality public transport services.</p> <p>Policy EN8 would ensure the proactive management of air quality.</p> <p>The sub-area policies and policies TR1, TR3, TR5, TR7, DS4, SC2-SC5, SC9 and SC10 would support the provision and uptake of sustainable and active travel opportunities in the District which would contribute to reducing vehicular air pollution.</p>
10. Transport	<p>The sub-area policies and policies TR1, TR3, TR7, DS4, SC2-SC5, SC9 and SC10 would support the provision and uptake of sustainable and active travel opportunities in the District.</p> <p>HO5 seeks to maximise densities and so could help to reduce the need to travel.</p> <p>HO7 encourages site allocations that reduce the need to travel and are accessible via quality public transport services.</p> <p>Policies TR1, TR2, TR3, TR4, TR5 and TR7 would facilitate a more efficient and integrated transport system in the District.</p>
11. Housing	<p>Policy SC1 would manage the delivery of housing to meet the District's needs.</p> <p>Policies SC4 and HO8-HO13 would ensure the delivery of a wide range of housing that would meet the District's growing and diverse housing needs including the need for affordable homes.</p> <p>Policies SC7 and HO1-HO8 would ensure that the housing needs of Bradford are met.</p> <p>Sub-area policies BD1, AD1, WD1, PN1 and ID1 would ensure that local affordable housing needs are met in the local sub-areas.</p>
12. Accessible Services	<p>Policy SC1 would support the delivery of housing and community services and facilities.</p> <p>Policies SC2, EN1, EN2a and EN2b would enhance outdoor recreational and leisure spaces within the District.</p>

SA Objective	Mitigating Policies
	<p>Policy SC4 would seek to transform the District's settlements into cohesive, inclusive spaces.</p> <p>Policies SC9 and SC10 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>HO7 encourages site allocations that are accessible to a range of services and community facilities.</p> <p>Sub-area policies BD2, AD2, WD2 and PN2 would direct investments towards the regeneration of town centres, including enhancements to the public realm and retail and leisure facilities, which would improve the access to services and amenities in the local sub areas.</p> <p>Sub-area policies BD1, AD1, WD1 and PN1 would seek to ensure that new community facilities are delivered along with new development which would ensure accessibility for new and existing residents to community services and facilities.</p> <p>Policies EC4 and EC5 would provide new and improved community services and leisure facilities in accessible locations in Bradford.</p> <p>Policies TR1, TR2, TR3, TR4, TR5 and TR7 would facilitate a more efficient and integrated transport system that would enhance accessibility of services.</p>
13. Social Cohesion	<p>DS5 would ensure that developments were designed to accommodate all accessibilities.</p> <p>Policies SC9 and SC10 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>HO7 encourages site allocations that are accessible to a range of services and community facilities.</p> <p>Policies EN1, EN2a and EN2b would enhance outdoor recreational and leisure spaces within the District which would support community interaction and social cohesion.</p> <p>Policies EC1-EC3 and EC5 would provide new and improved services and recreational facilities in accessible locations in Bradford.</p> <p>Sub-area policies BD1, AD1, WD1 and PN1 would seek to ensure that new community facilities are delivered along with new development which would ensure accessibility for new and existing residents to community services and facilities.</p> <p>TR1, TR3, and TR5 would enhance walking and cycling options which would facilitate greater social interaction.</p> <p>HO11 would help to ensure that affordable housing needs are met and this would be likely to benefit social cohesion.</p> <p>Policy HO9 would ensure the delivery of high-quality housing that would enable safe spaces for socialisation and support community cohesion.</p>
14. Culture & Leisure	<p>Sub-area policies BD2, AD2, WD2 and PN2 would direct investments towards the regeneration of town centres, including enhancements to the public realm and retail and leisure facilities, which would improve the access to services and amenities in the local sub areas.</p> <p>Policies SC9 and SC10 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>Policies SC1, SC2, EN1, EN2a and EN2b would enhance outdoor recreational and leisure spaces within the District.</p> <p>HO7 encourages site allocations that are accessible to a range of services and community facilities.</p> <p>EC1-EC3 and EC5 would provide new and improved cultural and leisure places and activities in accessible locations in Bradford.</p> <p>Policies TR1, TR2, TR3, TR4, TR5 and TR7 would facilitate a more efficient and integrated transport system that would enhance accessibility of services as well as leisure &amp; cultural areas.</p> <p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities.</p>
15. Safe &	<p>Policy SC1 would ensure that developments are of high quality and well-designed and support</p>

SA Objective	Mitigating Policies
Secure	<p>social, economic and environmental improvements in the District to promote a sense of safety and security.</p> <p>Policy SC4 would seek to transform the District’s settlements into cohesive, inclusive spaces.</p> <p>Policy SC10 would require developments to be designed in a way that makes spaces safe, inclusive and welcoming.</p> <p>HO7 encourages site allocations that avoid posing unacceptable risks to health and safety.</p> <p>Policies HO8-HO12 and sub-area policies BD1, AD1, WD1, PN1 would ensure local housing needs were met and that developments are of a high quality so to support safe and secure lives at home.</p> <p>Policies TR2 and TR6 would ensure that new parking facilities are designed to be safe and secure for people and property.</p>
16. Health	<p>SC1 and SC10 would ensure that developments contribute to the delivery of better health outcomes and contributes to a reduction in health inequalities.</p> <p>SC1, SC2, SC9 and SC10 and EN1 would enhance and preserve the District’s green spaces which encourage physical activity and improved physical and mental well-being.</p> <p>HO1 would help to ensure that housing needs in the District are satisfied and as such would make a major contribution towards ensuring people can live healthy and secure lives at home.</p> <p>HO7 encourages site allocations that avoid posing unacceptable risks to health and safety.</p> <p>EC1- EC5 would improve access to a range of high-quality employment opportunities which would reduce deprivation and contribute to improvements in mental health and well-being.</p> <p>Policies TR1, TR3 and TR4 would increase active travel opportunities which would have the potential to lead to improved physical and mental wellbeing through increased physical activity.</p>
17. Education	<p>Policies SC1 and SC4 would seek to achieve a wide range of employment opportunities in the District which would provide opportunities for training.</p> <p>Policy EC3 would provide a major boost to local education and skills learning through apprenticeships and higher education opportunities.</p> <p>Policy WD1 would include the provision of an educational facility in Wharfedale.</p>
18. Employment	<p>Policies SC1 and SC4 would seek to achieve a wide range of employment opportunities in the District.</p> <p>Policy SC10 would require proposals to support the delivery of jobs and key services which would lead to local employment opportunities.</p> <p>Policies EC2, EC3 and EC5 would ensure that job requirements stratified local needs and requirements.</p> <p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities which would increase employment opportunities and revenue in the tourism sector.</p> <p>Policy TR6 would support the development of Bradford’s freight industry which would lead to increase employment opportunities and revenue in the freight sector.</p> <p>Policies HO2, HO5, HO6 and HO7 would support the delivery of housing growth which would generate a significant number of employment opportunities within the construction sector and provide a boost to the local economy.</p> <p>All the sub-area policies would ensure good access to employment areas and support local employment opportunities that would provide a boost to the economy in the local sub-area.</p>
19. Economy	<p>Policies SC1 and SC4 would seek to achieve a wide range of employment opportunities in the District which would provide a boost to the local economy.</p> <p>Policy SC3 would seek to support economic growth and ensure there is a balance between housing supply and job demand.</p>

SA Objective	Mitigating Policies
	<p>Policy SC10 would require proposals to support the delivery of jobs and key services which would provide a boost to the local economy.</p> <p>EC1- EC5 would increase employment opportunities and ensure a sustainable boost to the local economy through supporting the regions focus on research, design, logistics, storage and distribution as well as enterprise and new start-ups.</p> <p>All the sub-area policies would ensure good access to employment areas and support local employment opportunities that would provide a boost to the economy in the local sub-area.</p> <p>HO1 would help to ensure that Bradford's housing needs can be met and would therefore enable the local economy to continue to grow and compete.</p> <p>Policies HO2, HO5, HO6 and HO7 would support the delivery of housing growth which would generate a significant number of employment opportunities within the construction sector and provide a boost to the local economy.</p> <p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities which would increase revenue from the tourism sector.</p> <p>Policy TR6 would support the development of Bradford's freight industry which would lead to increase employment opportunities and revenue in the freight sector.</p>

## Assessment Results

**Policy P1: Presumption in Favour of Sustainable Development** is not under review. The policy sets out the Council’s intention to work proactively with applicants in order to find solutions that enhance the sustainability of development proposals. Proposals that conform with Plan-policies would be approved without delay, whilst proposals for which there are no relevant policies then the decision-maker will grant permission unless material considerations suggest otherwise, including when adverse impacts outweigh positive impacts when assessed against policies in the NPPF or when specific policies in the NPPF indicate that development should be restricted. The policy would be expected to help ensure that new development in Bradford is relatively sustainable and secures improvements to on the social, economic and environmental spheres of sustainability, as required by the NPPF. Policies in the CSPR go beyond the NPPF and would be expected to help ensure that new development in Bradford respects local needs and requirements. P1 reinforces the need for development to conform with these policies.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages low-carbon development.
2. Waste		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages higher rates of reuse/reduce/recycle.
3. Land & buildings		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages more efficient use of land and buildings.
4. Climate change resilience		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages greater resilience to climate change.
5. Water resources		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages more efficient consumption of water + reduce risk of contamination or pollution of waterbodies.
6. Biodiversity & geodiversity		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages development to lead to improvements to biodiversity & geodiversity.
7. Landscape townscape		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages development to protect & enhance character.
8. Cultural heritage		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental conditions → encourages development to protect & enhance setting.
9. Air quality		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental & social conditions → encourages development to ensure site-users have good access to walking, cycling and public-transport routes.
10. Transport		P1	+	Bradford district	T/R	LT	M	P1 → development conforms with CSPR policies → local development needs are met → housing needs in Bradford more likely to be met.
11. Housing		P1	+	Bradford district	T/R	LT	M	P1 → improvements to economic & social conditions → likely to help encourage development that provides site-users with good access to key services, existing communities and amenities, communal areas and cultural places.
12. Accessible services		P1	+	Bradford district	T/R	LT	M	P1 → help ensure local development needs are met → housing needs met → reduced poverty & deprivation.
13. Social Cohesion		P1	+	Bradford district	T/R	LT	M	P1 → improvements to social conditions → likely to encourage development that contributes towards safe and secure businesses, neighbourhoods and homes.
14. Culture & leisure		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental, economic & social conditions → likely to help encourage development that provides site-users with access to key health services & semi-natural habitats.
15. Safe & secure		P1	+	Bradford district	T/R	LT	M	P1 → help ensure local development needs are met → housing needs met → reduced poverty & deprivation.
16. Health		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental, economic & social conditions → likely to help encourage development that provides site-users with access to education facilities.
17. Education		P1	+	Bradford district	T/R	LT	M	P1 → development conforms with CSPR policies → local development needs are met → employment needs met → improved on-the-job skills learning opportunities.
18. Employment		P1	+	Bradford district	T/R	LT	M	P1 → development conforms with CSPR policies → local development needs are met → employment needs met.
19. Economy		P1	+	Bradford district	T/R	LT	M	P1 → improvements to environmental, economic & social conditions → development likely to enhance local

Summary of, and assumptions in the assessment of, **Strategic Core Policies (SC1 - SC5)**

**Policy SC1: Overall Approach and Key Spatial Priorities** is under review. The preferred option makes reference to the updated plan period, provides a consistent approach to regeneration areas and includes reference to health and health inequalities. The reviewed policy would seek to ensure that development in Bradford is managed in order that the needs of the District to 2037 can be met and that this development contributes to a transformation of the local economic, environment and social conditions; enhances Bradford's role within the wider Leeds City Region as an important business location; optimises opportunities provided by the Leeds Bradford International Airport; enhances and supports the roles of Principal Towns, Local Growth Centres and Local Service Centres; protects and enhances natural and built environmental assets; ensures resilience to environmental threats; avoids increasing flood risk; encourages the shift towards sustainable forms of movement; contribute to inclusive built and natural environments that protect and enhance local character and settings; and contributes to the delivery of better health. Integrating these principles and priorities into the heart of the Council's decision making would be expected to make a significant contribution towards the environmental, economic and social sustainability of future development in Bradford.

- **Policy SC1 Reasonable Alternative 1 (SC1RA1):** Update the policy but consider a less extensive range of changes. This alternative would be likely to have largely similar impacts as the preferred option but with less probability due to the lack of detail on the scope and scale of changes.

**Policy SC2: Climate Change and Resource Use** is under review. The preferred option for the policy includes new references to Green Infrastructure (GI), the District's Climate Change Framework and air quality improvements. The reviewed policy would seek to ensure that planning decisions, strategies, investment and programmes plan for the long-term resilience of Bradford to the impacts of climate change. This would include, where appropriate, managing sources of flooding; enhancing vulnerable habitats; incorporating Green Infrastructure into developments; securing improvements to public transport and active travel options; positioning development in a way that minimises people's exposure to poor air quality; and supporting the roll out of electric vehicle charging points. SC2 seeks to mitigate the causes of climate change, including by maximising energy efficiency and sustainable transport use; locating development where it facilitates renewable energy generation; and engages with residents and businesses to create sustainable communities. The policy would also factor impacts on natural resources into decision making and require new development to reduce its environmental impact by utilising natural light and solar energy; being energy efficient; taking opportunities to produce and/or access renewable energy; minimise water consumption; and make an effective use of land and buildings. Overall, SC2 would be expected to make a major contribution towards ensuring that Bradford continues with the transition towards a low-carbon economy and society whilst enhancing the resilience of the local area to the potential impacts of climate change. Indirect benefits on other topics would also be likely, such as benefits to the health of local people as a result of enhanced walking and cycling opportunities.

- **Policy SC2 Reasonable Alternative 1 (SC2RA1):** Do not review the policy i.e. the policy remains unchanged from the adopted core strategy. The option could be considered to be less strategic in scope and would have less focus on specific air quality improvement measures, GI provision and re-use of existing land and buildings.
- **Policy SC2 Reasonable Alternative 2 (SC2RA2):** Developing a policy with a more defined and aspirational carbon reduction target (for example, a target of becoming carbon neutral). The option would make reference to the District's Climate Change Framework and would align with the targets set in the framework and the Council's Climate Emergency declaration. This policy would support a more ambitious carbon reduction target and therefore would be highly likely to strongly support the District's low carbon ambition.
- **Policy SC2 Reasonable Alternative 3 (SC2RA3):** Adopting a more succinct policy with technical detail referenced to a new Supplementary Planning Document (SPD). There could be a risk that the policy would provide insufficient detail and the SPD may lack a useful planning policy framework. The SPD would enable the council to develop a detailed and robust approach to climate change which would be highly likely to ensure that Bradford continues with the transition towards a low-carbon economy.

**Policy SC3: Working Together**

is not under review. The policy sets out a commitment to effective collaboration between the Council and adjoining planning authorities, Town and Parish Councils, partners, stakeholders and communities within Bradford and the surrounding region. The intention is to ensure that planning decisions, plans, strategies, investment and programmes are effective in supporting regeneration; addressing housing and employment needs; managing and enhancing the environment; and enhancing sustainable transport options. SC3 also sets out a commitment to effective discharge of duty to cooperate in order to address cross-boundary issues, align development; and coordinate investment. The policy would be expected to help ensure that the economic, social and environmental opportunities that new development and bring are effectively delivered at neighbourhood, district and regional scales.

**Policy SC4: Hierarchy of Settlements** is not under review. The policy establishes a hierarchy of settlements in the District by identifying Local Service Centres and Rural Areas, Local Growth Centres, Principal Towns and the Regional City. At each level of this hierarchy the policy establishes key priorities for future development in order to satisfy local needs and maximise on opportunities related to housing, employment, economic development and diversification, education, public transport, community, health, culture and the natural environment. The hierarchical approach to settlements is designed to help ensure that development can be directed towards the most sustainable locations. The approach proposed in SC4 would be expected to help ensure that the economic, social and environmental opportunities that new development can bring are effectively delivered and that development needs can be identified and met at a settlement by settlement basis.

**Policy SC5: Location of Development** is under review. The preferred option includes changes to Green Belt site prioritisation and a reordered movement hierarchy. The policy would seek to establish priorities for new locations of development. The first priority is the efficient and effective use of deliverable and developable previously developed land and buildings (that is not of high environmental value). The second priority is greenfield land within settlements. The third priority is limited release of Green Belt land. When identifying or comparing sites, the Council will priorities opportunities that make the best use of existing transport infrastructure, that maximise accessibility by walking and cycling and that support the use of public transport. The priorities for new sites set out in the preferred option would be expected to make a major contribution towards a sustainable approach to land-use in Bradford whilst also helping to reduce consumption and waste. Benefits to natural environment topics such as landscape and biodiversity would also be likely due to the focus on brownfield land and existing settlements. The focus on accessibility would also have a range of benefits, including reducing the carbon footprint and pollution of transport and enhancing active movement options for local people.

- **Policy SC5 Reasonable Alternative 1 (SC5RA1):** Do not review policy – policy would remain unchanged from the adopted core strategy policy. The movement hierarchy would remain unchanged and so accessibility of the strategic road network would be afforded a greater priority than access via walking and cycling as well as access to public transport. The third priority for site allocations would also remain as 'local Green Belt releases to the built-up areas of settlements in sustainable locations' as opposed to the preferred option, for which the third priority is 'limited release of Green Belt'. SC5RA1 could therefore encourage more development on Green Belt.
- **Policy SC5 Reasonable Alternative 2 (SC5RA2):** Undertake more limited changes to the policy and retain current Green Belt prioritisation - this may limit the opportunities for larger urban extensions to deliver ahead of smaller 'local' Green Belt development opportunities. This alternative could result in the release of more Green Belt land than the preferred option. The movement hierarchy would be the same as the preferred option, and so walking, cycling and public transport accessibility would be afforded a higher priority than access to the strategic road network.
- **Policy SC5 Reasonable Alternative 3 (SC5RA3):** Undertake more limited changes to the policy and delete Green Belt prioritisation element but retain movement hierarchy as drafted in adopted core strategy policy – does not align fully with updated transport and other policies, focused upon carbon reduction and air quality improvements. This alternative would not afford Green Belt land the same priority as the preferred option. However, the movement hierarchy would remain unchanged and so access to the strategic road network would be afforded greater priority than access via walking, cycling and public transport.

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
1. Energy & GHGs		SC1	+/-	Wider Leeds Region	P/I	LT	M	<p>SC1 &amp; SC1RA1 → support residential and employment development → increase in associated GHGs.                      SC1 &amp; SC1RA1 → encourage the shift towards sustainable movement + renewable energy → reduction in associated GHGs. SC1RA1 could result in impacts of slightly lower magnitude due to more limited scope.</p> <p>SC2, SC2RA2 &amp; SC2RA3 → support the roll out of electric charging points + aim to reduce emissions through securing improvements to active &amp; public transport options → reduction in associated GHGs.</p> <p>SC2, SCRA1, SC2RA2 &amp; SC2RA3 → seek to maximise energy efficiency in the district + locate development where it will support opportunities for renewable and low carbon energy → reduce District's energy demands and create sustainable energy sources → reduction in associated GHGs.</p> <p>SC2RA2 → support carbon reduction through a defined and ambitious carbon reduction target (e.g. going carbon neutral) → significant reduction in energy consumption and GHG emissions, potentially more so than SC2.                      SC2RA3 → SPD on climate change → potentially more detailed &amp; effective strategy for reducing carbon footprint.</p> <p>SC3 &amp; SC4 → enhancements sustainable transport modes → reduction in associated GHGs.</p> <p>SC5 and SC5RA2 → greater priority afforded to active and public transport accessibility of developments than strategic road network → reduction in associated GHG emissions.</p> <p>SC5RA1 and SC5RA3 → greater priority afforded to strategic road network accessibility of developments than public and active transport options → site-users likely to have higher rate of car usage → new GHG emissions.</p> <p><b>Recommendations:</b> SC2 could seek to incorporate defined targets for reducing carbon footprint.</p>
		SC1RA1	+/-	Wider Leeds Region	P/I	LT	L	
		SC2	++	Bradford District	T/R	LT	M	
		SC2RA1	++	Bradford District	T/R	LT	M	
		SC2RA2	++	Bradford District	T/R	LT	M	
		SC2RA3	++	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	+	Bradford District	T/R	LT	M	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	-	Bradford District	T/R	LT	M	
		SC5RA2	+	Bradford District	T/R	LT	M	
SC5RA3	-	Bradford District	T/R	LT	M			
2. Waste		SC1	-	Wider Leeds Region	T/R	LT	M	<p>SC1 &amp; SC1RA1 → support residential and employment development → increase in associated waste.                      SC2, SC2RA2 &amp; SC2RA3 → encourage conversion of existing buildings and reuse of PDL → waste reduction.</p> <p>SC2RA1 → no focus on using PDL → development likely to generate more waste.</p> <p>SC3 &amp; SC4 → no discernible impacts.</p> <p>SC5, SC5RA1, SC5RA2 &amp; SC5RA3 → first priority for new sites is PDL → reduction in associated waste.</p> <p>SC5RA1 &amp; SC5RA2 → potential for greater Green Belt land release than SC5 &amp; SC5RA2 →</p> <p>SC2RA1 &amp; SC4 → no discernible impacts.</p> <p><b>Recommendations:</b> SC1 or SC2 could seek to incorporate waste and achieving high rates of recycling as a priority for new development.</p>
		SC1RA1	-	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	-	Bradford District	n/a	n/a	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	0	Wider Leeds Region	n/a	n/a	H	
		SC4	0	Bradford District	n/a	n/a	H	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
SC5RA2	+	Bradford District	T/R	LT	M			
SC5RA3	+	Bradford District	T/R	LT	M			
3. Land & buildings		SC1	-	Wider Leeds Region	T/R	LT	M	<p>SC1 &amp; SC1RA1 → support residential and employment development → new development on greenfield.</p> <p>SC2, SC2RA2 &amp; SC2RA3 → ensure the most effective use of land, through the conversion of existing buildings and reuse of previously developed land.</p> <p>SC2RA1, SC3 &amp; SC4 → no discernible impacts</p> <p>SC5 → second and third priority to the development on greenfield and limited Green Belt land → inherent acceptance of some degree of development on greenfield.</p>
		SC1RA1	-	Wider Leeds Region	T/R	LT	L	
		SC2	++	Bradford District	T/R	LT	M	
		SC2RA1	0	Bradford District	n/a	n/a	H	
		SC2RA2	++	Bradford District	T/R	LT	M	
		SC2RA3	++	Bradford District	T/R	LT	M	
		SC3	0	Wider Leeds Region	n/a	n/a	H	

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		SC4	0	Bradford District	n/a	n/a	H	SC5, SC5RA1, SC5AR2, SC5RA3 → prioritise the reuse of previously developed land and buildings. SC5RA1 and SC5RA2 → more Green Belt release than SC5RA3 and SC5 → likely loss of more greenfield. <b>Recommendations:</b> SC1 could seek to all ensure that the District's most ecologically and agriculturally valuable soils are prevented from being lost or irreversibly altered due to development.
		SC5	+/-	Bradford District	T/R	LT	L	
		SC5RA1	+/-	Bradford District	T/R	LT	L	
		SC5RA2	+/-	Bradford District	T/R	LT	L	
		SC5RA3	+/-	Bradford District	T/R	LT	L	
4. Climate change vulnerability		SC1	++	Wider Leeds Region	T/R	LT	M	SC1 & SC1RA1 → avoid increasing flood risk + manage land and river catchments for flood risk + increase tree cover → reduction in flood risk. SC2, SCRA1, SC2RA2 & SC2RA3 → work with partners and local communities to reduce and manage all sources of flooding + support the expansion of habitats (e.g. blanket bogs and wood land) + ensure GI is implemented where appropriate + maximise SuDs → increase interception and storage of rainwater → reduce flood risk. SC3 → effective environmental management and enhancement in order to address climate change + ensure landscape and environmental management and enhancement → contribute to reducing flood risk. SC4 → create new green areas, networks and corridors → increase interception and storage of rainwater → reduce flood risk. SC5, SC5RA1, SC5RA2 & SC5RA3 → prioritise development on PDL, however permit development on greenfield and/or Green Belt land → potential loss of vegetation and permeable surfaces → increase in overland flow. <b>Recommendations:</b> SC5 could seek to limit upslope development
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	++	Bradford District	T/R	LT	M	
		SC2RA1	++	Bradford District	T/R	LT	M	
		SC2RA2	++	Bradford District	T/R	LT	M	
		SC2RA3	++	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	+	Bradford District	T/R	LT	M	
		SC5	-	Bradford District	P/I	LT	M	
		SC5RA1	-	Bradford District	P/I	LT	M	
5. Water resources		SC1	-	Wider Leeds Region	T/R	LT	M	SC1 & SC1RA1 → support & encourage new residential development → increase in water consumption. SC2, SCRA1, SC2RA2 & SC2RA3 → ensure new developments use resources sustainably → minimise water consumption and maximise water recycling. SC5, SC5RA1, SC5RA2 & SC5RA3 → priority is for PDL but still facilitate some degree of development on greenfield → potential risk to quality of nearby waterbodies. SC3 & SC4 → no discernible impacts <b>Recommendations:</b> SC1 could seek to ensure that new development is resource-efficient, including water use.
		SC1RA1	-	Wider Leeds Region	T/R	LT	L	
		SC2	++	Bradford District	T/R	LT	M	
		SC2RA1	++	Bradford District	T/R	LT	M	
		SC2RA2	++	Bradford District	T/R	LT	M	
		SC2RA3	++	Bradford District	T/R	LT	M	
		SC3	0	Wider Leeds Region	n/a	n/a	H	
		SC4	0	Bradford District	n/a	n/a	H	
		SC5	+/-	Bradford District	T/R	LT	L	
		SC5RA1	+/-	Bradford District	T/R	LT	L	
6. Biodiversity & geodiversity		SC1	++	Wider Leeds Region	T/R	LT	M	SC1 & SC1RA1 → protect and enhance environmental resources, such as the South Pennine Moors + manage land and river catchments for biodiversity enhancement + increase tree cover → maintain, protect and enhance natural habitats. SC2, SCRA1, SC2RA2 & SC2RA3 → facilitate the management and expansion of vulnerable habitats and supporting action plans for habitats and species at risk + integrate GI into new and regeneration projects → maintain, protect and enhance natural habitats. SC3 → seek to ensure environmental management and enhancement
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	++	Bradford District	T/R	LT	M	
		SC2RA1	++	Bradford District	T/R	LT	M	
		SC2RA2	++	Bradford District	T/R	LT	M	
		SC2RA3	++	Bradford District	T/R	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		SC3	+	Wider Leeds Region	T/R	LT	M	SC4 → seek to create new and improved existing green areas, corridors and networks → create new habitats and ecological corridors → enhance biodiversity. SC5, SC5RA1, SC5RA2 & SC5RA3 → prioritise PDL sites but would permit development on greenfield and/or Green Belt land → potential loss of habitat + reduction in ecological connectivity. <b>Recommendations: None.</b>
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+/-	Bradford District	T/R	LT	L	
		SC5RA1	+/-	Bradford District	T/R	LT	L	
		SC5RA2	+/-	Bradford District	T/R	LT	L	
		SC5RA3	+/-	Bradford District	T/R	LT	L	
7. Landscape & townscape		SC1	++	Wider Leeds Region	T/R	LT	M	SC1 & SC1RA1 → ensure developments are of high quality and well-designed + protect and enhance local setting and heritage → reinforce/ create a sense of local character and distinctiveness → create a high-quality townscape. SC2, SCRA1, SC2RA2 & SC2RA3 → facilitate the management, enhancement and expansion of vulnerable habitats + integrate GI into new and regeneration projects → protect and enhance natural and built landscapes. SC3 → seek to ensure landscape and environmental management and enhancement. SC4 → seek to develop a strong sense of place and distinct identity + seek to develop a high-quality public realm with well-designed buildings + create new and improved existing green areas, corridors and networks → enhance townscape and landscape. SC5, SC5RA1, SC5RA2 & SC5RA3 → prioritise the reuse and development of previously developed land and buildings → potential to regenerate PDL → potential to enhance townscape.
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+/-	Bradford District	P/I	LT	L	
		SC5RA1	+/-	Bradford District	P/I	LT	L	
8. Cultural heritage		SC1	++	Wider Leeds Region	T/R	LT	M	SC5, SC5RA1, SC5RA2 & SC5RA3 → permit development on greenfield and/or Green Belt land → potential risk of impacts on natural landscape character + impacts on setting of heritage assets/historic areas, particularly where open spaces are lost. SC5 & SC5RA3 would result in less Green Belt sites development on than SC5RA1 & SC5RA2. <b>Recommendations: None.</b>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	+	Bradford District	T/R	LT	M	
		SC5	+/-	Bradford District	P/I	LT	L	
		SC5RA1	+/-	Bradford District	P/I	LT	L	
		SC5RA2	+/-	Bradford District	P/I	LT	L	
		SC5RA3	+/-	Bradford District	P/I	LT	L	
9. Air quality		SC1	+/-	Wider Leeds Region	T/R	LT	M	SC1, SC1RA1, SC2, SCRA1, SC2RA2 & SC2RA3 → support renewable energy generation & energy efficiency → reduction in air pollution associated with energy generation & consumption. SC1, SC3 & SC4 → enhanced sustainability of patterns of development and transport → increased uptake of sustainable transport options → reduction in air pollution associated with transport.
		SC1RA1	+/-	Wider Leeds Region	T/R	LT	L	
		SC2	++	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	++	Bradford District	T/R	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		SC2RA3	++	Bradford District	T/R	LT	M	<p>SC1 &amp; SC1RA1 → support residential and employment development → increase in associated air pollution.</p> <p>SC2, SC2RA2 &amp; SC2RA3 → improvements to public transport &amp; active transport options + supports roll out of electric car charging points → more sustainable movements + reduced congestion → improved air quality.</p> <p>SC5 and SC5RA2 → more active &amp; public transport uptake + reduced congestion → improved air quality.</p> <p>SC5RA1 and SC5RA3 → would seek to maximise walking and cycling and public transport access to developments → support and encourage sustainable transport options → reduce congestion + air pollution.</p> <p><b>Recommendations: None.</b></p>
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	++	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
		SC5RA2	++	Bradford District	T/R	LT	M	
		SC5RA3	+	Bradford District	T/R	LT	M	
10. Transport		SC1	+/-	Wider Leeds Region	T/R	LT	L	
		SC1RA1	+/-	Wider Leeds Region	T/R	LT	L	
		SC2	++	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	++	Bradford District	T/R	LT	M	
		SC2RA3	++	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	++	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
		SC5RA2	++	Bradford District	T/R	LT	M	
		SC5RA3	+	Bradford District	T/R	LT	M	
11. Housing		SC1	++	Wider Leeds Region	T/R	LT	M	<p>SC1 &amp; SC1RA1 → manage the delivery of housing to meet the needs of the district + supply the associated services and community facilities.</p> <p>SC2, SCRA1, SC2RA2 &amp; SC2RA3 → provision of renewable energies at new developments + GI at new development → sustainable and resilient housing and communities.</p> <p>SC3 → manage economic growth and housing growth → ensure the balance between housing and employment opportunities → ensures there is sufficient housing to meet demand.</p> <p>SC4 → seek to achieve a wide range of housing and services to meet the needs of communities.</p> <p>SC5, SC5RA1, SC5RA2 &amp; SC5RA3 → set out criteria for the prioritisation of development land allocation → ensure suitable land and location allocation for housing.</p> <p><b>Recommendations: None</b></p>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
12. Range of		SC1	++	Wider Leeds Region	T/R	LT	M	<p>Each policy → support &amp; enhance sustainable and active transport options → improved accessibility of facilities and services as well as communal spaces and cultural areas.</p> <p>SC1 &amp; SC1RA1 → delivery of housing and community services and facilities + support local service centres →</p>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
accessible services		SC2RA2	+	Bradford District	T/R	LT	M	provision of a range of community services.
		SC2RA3	+	Bradford District	T/R	LT	M	SC1 & SC1RA1 → protect and enhance the District's environmental resources, such as South Pennine Moors → preserves the districts green/leisure spaces + encourage leisure activities and physical activity
		SC3	++	Wider Leeds Region	T/R	LT	M	
		SC4	+	Bradford District	T/R	LT	M	SC2, SC2RA1, SC2RA2 & SC2RA3 → support the management, enhancement and expansion of vulnerable habitats, such as woodlands → preserves the districts green/leisure spaces
		SC5	+/-	Bradford District	P/I	LT	L	
		SC5RA1	+/-	Bradford District	P/I	LT	L	SC2, SCRA1, SC2RA2 & SC2RA3 → locate development where it will support opportunities for the delivery of GI and improvements to public transport and facilities for walking and cycling → ensures accessibility to services + supports active travel → encourages physical activity → improve fitness levels.
		SC5RA2	+/-	Bradford District	P/I	LT	L	
		SC5RA3	+/-	Bradford District	P/I	LT	L	
13. Social Cohesion		SC1	++	Wider Leeds Region	T/R	LT	L	SC3 → ensure the balance between housing and employment opportunities + support economic growth → ensure the provision of adequate economic networks.
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	++	Bradford District	T/R	LT	L	
		SC2RA1	++	Bradford District	T/R	LT	L	SC3 → ensure landscape and environmental management and enhancement → maintain and improve outdoor spaces → improve the recreational and leisure value of spaces.
		SC2RA2	++	Bradford District	T/R	LT	L	
		SC2RA3	++	Bradford District	T/R	LT	L	SC4 → improve connectivity in the region between housing, employment and community facilities → ensures accessibility to community facilities and services.
		SC3	++	Wider Leeds Region	T/R	LT	L	
		SC4	++	Bradford District	T/R	LT	L	SC4 → develop a strong sense of place and high-quality public realm + create and improve green area, networks and corridors in the district + provision of cultural activities → provision of cultural and leisure spaces → increase tourism.
		SC5	+/-	Bradford District	P/I	LT	L	
		SC5RA1	+/-	Bradford District	P/I	LT	L	SC5, SC5RA1, SC5RA2 & SC5RA3 → permit development on greenfield and/or Green Belt land → potential loss and/or disturbance of open spaces/leisure areas. SC5 & SC5RA3 would be expected to result in less Green Belt sites development on than SC5RA1 & SC5RA2.
		SC5RA2	+/-	Bradford District	P/I	LT	L	
SC5RA3	+/-	Bradford District	P/I	LT	L			
14. Culture & leisure		SC1	++	Wider Leeds Region	T/R	LT	M	<b>Recommendations: None.</b>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+/-	Bradford District	P/I	LT	L	
		SC5RA1	+/-	Bradford District	P/I	LT	L	
		SC5RA2	+/-	Bradford District	P/I	LT	L	
SC5RA3	+/-	Bradford District	P/I	LT	L			
		SC1	++	Wider Leeds Region	T/R	LT	M	SC1 & SC1RA1 → ensure that developments are of high quality and well-designed + seeks to improve the economic, environmental, physical and social conditions of the District → promote a sense of safety and security.
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
15. Safe & secure		SC2RA1	+	Bradford District	T/R	LT	M	<p>SC4 → seek to transform the District's settlements into cohesive, inclusive safe places.</p> <p>SC2, SCRA1, SC2RA2, SC2RA3, SC3, SC5, SC5RA1, SC5RA2 &amp; SC5RA3 → no discernible impacts.</p> <p>All policies → development likely to be accessible via walking and cycling → natural surveillance → reduced risk of crime.</p> <p><b>Recommendations: None.</b></p>
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	+	Bradford District	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
		SC5RA2	+	Bradford District	T/R	LT	M	
		SC5RA3	+	Bradford District	T/R	LT	M	
16. Health		SC1	++	Wider Leeds Region	T/R	LT	M	<p>SC1 &amp; SC1RA1 → ensure the local plan and development contributes to the delivery of better health and reduction in health equalities.</p> <p>All policies → improvements to air quality → reduction in impacts of air pollution on health.</p> <p>SC1, SC2, SC4 &amp; SC4 → increased uptake in walking and cycling → encourages physical activity + reduce vehicle emissions → improve mental and physical well-being.</p> <p>SC5, SC5RA1, SC5RA2 and SC5RA3 → sites accessible via walking and cycling → increase physical activity → improve mental and physical well-being. SC5 &amp; SC5RA2 afford greater priority to walking &amp; cycling → greater magnitude of positive effect than SC5RA1 &amp; SC5RA2.</p> <p><b>Recommendations: None.</b></p>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	+	Bradford District	T/R	LT	M	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
17. Education		SC1	++	Wider Leeds Region	T/R	LT	M	<p>Each policy → support sustainable transport options → improved accessibility of educational facilities.</p> <p>SC1 &amp; SC1RA1 → seek to enhance the role of the District as an important business location with a good supply of labour and services → increase training and employment opportunities.</p> <p>SC4 → seek to achieve a wide range of employment opportunities → increase training and employment opportunities.</p> <p><b>Recommendations: None.</b></p>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	+	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
		SC1	++	Wider Leeds Region	T/R	LT	M	<p>Each policy → support improvements of sustainable transport options → improve access to employment sites and community and retail services.</p>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
18. Employment		SC2	+	Bradford District	T/R	LT	M	SC1 & SC1RA1 → seek to enhance the role of the District as an important business location with a good supply of labour and services + seek to establish an international business gateway in proximity to Leeds Bradford airport + encourage diversification of the rural economy → increase economic growth and employment opportunities in the District. SC3 → seeks to support economic growth + ensure housing provision is balanced with employment opportunities → boost the local economy. SC4 → seeks to achieve a wide range of employment opportunities + improve connectivity to employment areas → increase employment levels + boost local economy.
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	++	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
		SC5RA2	+	Bradford District	T/R	LT	M	
		SC5RA3	+	Bradford District	T/R	LT	M	
19. Economy		SC1	++	Wider Leeds Region	T/R	LT	M	<b>Recommendations: None.</b>
		SC1RA1	++	Wider Leeds Region	T/R	LT	L	
		SC2	+	Bradford District	T/R	LT	M	
		SC2RA1	+	Bradford District	T/R	LT	M	
		SC2RA2	+	Bradford District	T/R	LT	M	
		SC2RA3	+	Bradford District	T/R	LT	M	
		SC3	++	Wider Leeds Region	T/R	LT	M	
		SC4	++	Bradford District	T/R	LT	M	
		SC5	+	Bradford District	T/R	LT	M	
		SC5RA1	+	Bradford District	T/R	LT	M	
		SC5RA2	+	Bradford District	T/R	LT	M	
		SC5RA3	+	Bradford District	T/R	LT	M	

Summary of, and assumptions in the assessment of, **Strategic Core Policies SC6 - SC10**

**Policy SC6: Green Infrastructure** is under review. The preferred option for SC6 would be to ensure that plans, policies, strategies, decisions and investment supports and encourages the maintenance, enhancement and extension of multi-functional spaces, routes and key areas of GI. Development would be encouraged to link together areas and to create GI corridors where gaps exist. The GI network would take account of benefits to quality of place, the economy, climate change resilience, healthy living, sustainable transport and reversing biodiversity decline. The River Corridors of the Aire and Wharfe along with the South Pennine Moors are of particular focus. The strategic GI network will be defined further in the Site Allocations DPD and also shown on the Policies Map. The Site Allocations DPD will also identify locations with opportunities for development to provide and/or enhance GI. Bradford's GI network provides local people with a range of essential ecosystem services such as flood risk alleviation, access to biodiversity, improving air quality and sequestering carbon (alongside other forms of nutrient cycling), whilst also providing significant benefits to the local economy, such as by increasing footfall in town centres, society, such as by providing multi-functional spaces suitable for socialisation, and individual health, such as by enhanced active travel opportunities or better access to semi-natural habitats. The preferred option for SC6 would therefore be expected to result in highly beneficial impacts for all SA Objectives with significant positive impacts on objectives related to the natural environment being highly likely.

- **Policy SC6 Reasonable Alternative 1 (SC6RA1):** Do not review policy – this alternative would remain unchanged from the adopted core strategy policy. The key difference is that the version of the policy in the adopted Core Strategy does not require new development to identify opportunities for linking gaps in the GI network. It also offers less protection to green space and corridors that make a significant contribution to the GI network. Whilst SC6RA1 would have largely similar impacts as SC6 on most SA Objectives, these would likely be of a lower magnitude with less probability, particularly for the biodiversity themed objective.
- **Policy SC6 Reasonable Alternative 2 (SC6RA2):** This alternative would include a detailed map of GI in Bradford with targeted areas for improvement. Defining GI detail would be included within both the Site Allocations DPD and a further iteration of the Policies Map, rather than a high-level policy only for which further detailed explanation may be required through the Site Allocations DPD. This alternative would have largely similar impacts as SC6 on most SA Objectives, these could be of a higher probability due to the greater certainty that mapping could offer.
- **Policy SC6 Reasonable Alternative 3 (SC6RA3):** This alternative would lead to a more succinct format of the policy but would be supported by an SPD on GI. This could facilitate a more detailed and effective strategy for management of Bradford's GI network but could lack a more useful planning policy framework. SPDs can only provide more detailed guidance to established policies and so this approach may be of limited value in planning terms.

**Policy SC7: Green Belt and Safeguarded Land** is under review. The Council's preferred option would confirm that SC7 provides the strategic overview on key changes to the Green Belt that are necessary to accommodate housing growth whilst the Allocations DPD will set out detailed changes to the Green Belt in line with this. The Allocations DPD would also identify areas of safeguarded land for meeting longer term housing needs. SC7 would be expected to help facilitate future residential development on Green Belt land. This would help to ensure that Bradford's housing needs can be met but it also poses a risk to the character, setting and biodiversity value of Green Belt land. Given the uncertainty over which Green Belt sites would be released at this stage, there is a degree of uncertainty over the potential impacts, and the magnitude of these impacts, of development.

- **Policy SC7 Reasonable Alternative 1 (SC7RA1):** The first alternative identified by the Council is to set out further detail on the land to be removed from the Green Belt and inset settlements. This approach would allow the Council to predict the likely impacts of development in the Green Belt with greater certainty at an early stage, although for the purpose of assessments in the SA the precise location of sites is still unknown at this stage.
- **Policy SC7 Reasonable Alternative 2 (SC7RA2):** The second alternative identified by the Council was to exclude safeguarded land from the policy. Impacts of this alternative would largely be the same as the preferred option, although it could potentially lead to less certainty regarding longer-term development needs.

- **Policy SC7 Reasonable Alternative 3 (SC7RA3):** The third alternative identified by the Council would be to reduce the level of safeguarded land required by discounting the Holme Wood urban extension post-Plan delivery. This approach would be expected to result in largely similar impacts to the preferred option, but with less certainty over longer term development needs being satisfied.

**Policy SC8: Protecting the South Pennine Moors and their Zone of Influence** is currently not under review, subject to the outcomes of the HRA process, although there have been minor text amendments since the version in the adopted core strategy. The intention of the policy is to be in line with the findings and outcomes of the HRA process. The policy establishes three zones around the SPA & SAC, including 400m, 2.5km and 7km from the SPA & SAC’s boundary. Within these zones, development will be restricted and closely managed and monitored to avoid increased recreational pressures on the sensitive biodiversity designations. SC8 would be expected to make a major contribution towards protecting and enhancing the SAC & SPA.

**Policy SC9: Making Great Places** is not under review. The policy would require development proposals in Bradford to contribute towards the creation of high-quality places as well as attractive and sustainable communities. This would involve proposals understanding the sense of place and context of development; responding to the District’s distinctive features and character; creating a strong sense of place; providing a well-connected network of attractive routes for movement; and designing places that can adapt to changing needs. The policy would be highly likely to help ensure that development in Bradford has positive impacts on SA Objectives related to landscape, townscape, cultural heritage, transport and those related to communities and access.

**Policy SC10: Healthy Places** is a new policy. The preferred option is for a policy that seeks to ensure new development maximises health and wellbeing gains, with negative impacts avoided or mitigated, including by enabling active travel; contributing towards safe, inclusive and welcoming neighbourhoods; reducing negative impacts on the causes of climate change; minimising exposure to pollutants; supporting the delivery of housing, jobs and key services; protecting and improvement multi-functional green spaces; developer contributions towards new or enhance health care facilities; an ensuring additional health care facilities are accessible via public transport. Major development proposals would also need to be supported by an HIA. The preferred option for this new policy would be likely to lead to positive impacts on a range of SA Objectives beyond just the health objective due to the sought enhancements for safety, sustainable movement, green spaces, new homes, new jobs and new community services.

- **Policy SC10 Reasonable Alternative 1 (SC10RA1):** The first alternative would be to have no new policy. This alternative would result in no impacts on the SA Objectives.
- **Policy SC10 Reasonable Alternative 2 (SC10RA2):** The second alternative for SC10 would be to have a policy of more limited scope that also excludes the need for HIAs from major development proposals. This approach would be likely to result in many similar benefits to the preferred option, but of a lesser magnitude and with a lower probability.
- **Policy SC10 Reasonable Alternative 3 (SC10RA3):** The third alternative would be to reduce the scale of the policy and refer to an SPD focussed on this topic for supporting detail. This could enable a more detailed and effective approach towards delivering healthy places in Bradford but runs the risk of lacking a useful planning policy framework.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		SC6	+	Bradford District	T/R	LT	M	SC6 & its alternatives & SC8 → protection and enhancement of GI, green spaces and greenfield which are important sequestrators of carbon → carbon sinks in Bradford protected and enhanced. SC6RA2 would likely provide greater protection than SC6 or SC6RA1. SC9 and SC10, SC10RA2 & SC10RA3 → protection & enhancement of GI in development → carbon sink. SC10 would be likely to do so more than its alternatives. SC9, SC10, SC10RA2 & SC10RA3 → improved walking, cycling and public transport accessibility at new
		SC6RA1	+	Bradford District	T/R	LT	L	
		SC6RA2	+	Bradford District	T/R	LT	H	
		SC6RA3	+	Bradford District	T/R	LT	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		SC7	-	Bradford District	T/R	LT	L	<p>developments → positive contribution towards District's transition to a low-carbon transport sector.</p> <p>SC7 and its alternatives → development in Green Belt → loss of greenfield land (carbon sink) + residents likely to need to travel longer distances e.g. to access services or employment. No discernible differences between SC7 or its alternatives for this SA Objective.</p> <p>SC10RA1 → no policy → no discernible impacts.</p> <p><b>Recommendations:</b> Policy SC10 could make specific reference to encouraging development proposals that incorporate renewable energy generation capacity with regards to creating healthy and great places.</p> <p>Where GI elements are protected and enhanced through SC6, the Council could include a consideration of the carbon sink capacity of these elements and encourage proposals to show how the carbon sink capacity of nearby GI would be impacted.</p>
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	+	Bradford District	T/R	LT	M	
		SC9	++	Bradford District	T/R	LT	M	
		SC10	+	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	+	Bradford District	T/R	LT	M	
SC10RA3	+	Bradford District	T/R	LT	M			
2. Waste		SC6	O	n/a	n/a	n/a	H	<p>SC6 and its alternatives, SC7 and its alternatives, SC8 and SC10RA1 → no discernible impacts.</p> <p>SC9, SC10, SC10RA2 &amp; SC10RA3 → encourage efficient use of land and materials → reduction in waste generated from construction. SC10 would be likely to have a positive impact of a slightly greater magnitude than its alternatives.</p> <p><b>Recommendations:</b> As a component of 'healthy places' SC10 could encourage proposals to ensure that new residents or site-users are able to conveniently recycle &amp; compost in a manner that avoids adverse health impacts.</p>
		SC6RA1	O	n/a	n/a	n/a	H	
		SC6RA2	O	n/a	n/a	n/a	H	
		SC6RA3	O	n/a	n/a	n/a	H	
		SC7	O	n/a	n/a	n/a	H	
		SC7RA1	O	n/a	n/a	n/a	H	
		SC7RA2	O	n/a	n/a	n/a	H	
		SC7RA3	O	n/a	n/a	n/a	H	
		SC8	O	n/a	n/a	n/a	H	
		SC9	+	Bradford District	T/R	LT	M	
		SC10	+	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	+	Bradford District	T/R	LT	M	
SC10RA3	+	Bradford District	T/R	LT	M			
3. Land & buildings		SC6	+	Bradford District	T/R	LT	M	<p>SC6 and its alternatives &amp; SC8 → protected and enhanced GI elements and green spaces → greenfield land potentially protected and enhanced = efficient management of land. SC6RA2 would likely to do so more than SC6 or SC6RA1.</p> <p>SC9 and SC10, SC10RA2 &amp; SC10RA3 → protected and enhanced GI in development → potential for open space being preserved in developments → sustainable management of land.</p> <p>SC7 &amp; its alternatives → development in Green Belt → likely to require development on greenfield land. SC7RA1 &amp; SC7RA2 → less safeguarded land for future development → uncertain if this could result in less development in the Green Belt than SC7 or if development in the Green Belt would be less controlled. No discernible differences between SC7 or its alternatives for this SA Objective.</p> <p>SC10RA1 → no policy → no discernible impacts</p>
		SC6RA1	+	Bradford District	T/R	LT	L	
		SC6RA2	+	Bradford District	T/R	LT	H	
		SC6RA3	+	Bradford District	T/R	LT	H	
		SC7	-	Bradford District	T/R	LT	L	
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	+	Bradford District	T/R	LT	M	
SC9	+	Bradford District	T/R	LT	M			
SC10	+	Bradford District	T/R	LT	M			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
4. Climate change vulnerability		SC10RA1	0	n/a	n/a	n/a	H	<b>Recommendations:</b> SC7 could seek to ensure that new development in the Green Belt avoids the loss of, or irreversible harm to, BMV soils.
		SC10RA2	+	Bradford District	T/R	LT	M	
		SC10RA3	+	Bradford District	T/R	LT	M	
		SC6	+	Bradford District	T/R	LT	M	SC6 and its alternatives and SC8 → protected and enhanced open green spaces and important habitats → above ground vegetation & permeable soils protected and enhanced → enhanced sustainable management of flood risk. SC6RA2 could have a lightly greater beneficial impact than SC6, SC6RA or SC6RA3.
		SC6RA1	+	Bradford District	T/R	LT	L	
		SC6RA2	+	Bradford District	T/R	LT	H	S9 and SC10, SC10RA2 & SC10RA3 → protected and enhanced GI in development → potential for open space being preserved in developments & incorporation of above ground vegetation → potential for enhanced sustainable management of flood risk.
		SC6RA3	+	Bradford District	T/R	LT	H	
		SC7	-	Bradford District	T/R	LT	L	SC10RA1 → no policy → no discernible impacts.
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	SC10 → includes requirement for proposals to contribute to 'measures that mitigate against the effects of climate change' → likely to include measures that mitigate risk and impacts of flooding. Uncertain if this would be included in SC10RA2 & SC10RA3.
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	+	Bradford District	T/R	LT	M	SC7 & its alternatives → development in the Green Belt → likely to involve development on greenfield → potential for negative impacts on surface run-off due to new hard standing & loss of GI & permeable soils. No discernible differences between SC7 or its alternatives for this SA Objective.
		SC9	+	Bradford District	T/R	LT	M	
	SC10	++	Bradford District	T/R	LT	M	<b>Recommendations:</b> SC7 could seek to ensure that upslope Green Belt land is not developed on.	
	SC10RA1	0	n/a	n/a	n/a	H		
	SC10RA2	+	Bradford District	T/R	LT	L		
5. Water resources		SC10RA3	+	Bradford District	T/R	LT	L	SC6 & its alternatives and SC8 → protected and enhanced open green spaces and important habitats → above ground vegetation & permeable soils protected and enhanced → protection of quality of local waterbodies and overland flow.
		SC6	+	Bradford District	T/R	LT	M	
		SC6RA1	+	Bradford District	T/R	LT	L	S9 and SC10, SC10RA2 & SC10RA3 → protected and enhanced GI in development → potential for open space being preserved in developments & incorporation of above ground vegetation → potential for protection of quality of local waterbodies and overland flow.
		SC6RA2	+	Bradford District	T/R	LT	H	
		SC6RA3	+	Bradford District	T/R	LT	H	SC7 & its alternatives → development in the Green Belt → loss of greenfield & GI + development in proximity to natural waterbodies → potential for negative impacts on water quality caused by construction & new hard-standing. No discernible differences between SC7 or its alternatives for this SA Objective.
		SC7	-	Bradford District	T/R	LT	L	
		SC7RA1	-	Bradford District	T/R	LT	L	SC10RA1 → no policy → no discernible impacts.
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	<b>Recommendations:</b> None.
		SC8	+	Bradford District	T/R	LT	M	
		SC9	+	Bradford District	T/R	LT	M	SC6 & its alternatives and SC8 → protected and enhanced green spaces, GI and important habitats → protected and enhanced biodiversity & ecological connectivity.
		SC10	+	Bradford District	T/R	LT	M	
		SC10RA1	0	n/a	n/a	n/a	H	
6. Biodiversity & geodiversity		SC10RA2	+	Bradford District	T/R	LT	M	S9 and SC10, SC10RA2 & SC10RA3 → protected and enhanced GI in development → potential for development to enhance biodiversity value of sites and their role in ecological connectivity.
		SC10RA3	+	Bradford District	T/R	LT	M	
		SC6	++	Bradford District	T/R	LT	M	S9 and SC10, SC10RA2 & SC10RA3 → protected and enhanced GI in development → potential for development to enhance biodiversity value of sites and their role in ecological connectivity.
		SC6RA1	++	Bradford District	T/R	LT	L	
	SC6RA2	++	Bradford District	T/R	LT	H	S9 and SC10, SC10RA2 & SC10RA3 → protected and enhanced GI in development → potential for development to enhance biodiversity value of sites and their role in ecological connectivity.	
	SC6RA3	++	Bradford District	T/R	LT	H		

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		SC7	-	Bradford District	T/R	LT	L	<p>SC7 &amp; its alternatives → development in the Green Belt → likely to involve development on greenfield → potential for negative impacts on biodiversity value of sites &amp; local ecological connectivity. No discernible differences between SC7 or its alternatives for this SA Objective.</p> <p>SC10RA1 → no policy → no discernible impacts.</p> <p><b>Recommendations:</b> SC7 could seek to incorporate particularly stringent controls over the provision of GI and open space in proposals for development on Green Belt land in order to preserve biodiversity value &amp; ecological connectivity.</p>
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	++	Bradford District	T/R	LT	M	
		SC9	+	Bradford District	T/R	LT	M	
		SC10	+	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	+	Bradford District	T/R	LT	M	
SC10RA3	+	Bradford District	T/R	LT	M			
7. Landscape & townscape		SC6	++	Bradford District	T/R	LT	M	<p>SC6 and its alternatives and SC8 → protected and enhanced green spaces, GI and important habitats → protection and enhancement of distinctive natural landscapes + potential for protection and enhancement of setting of nearby heritage assets or historic areas. SC6RA2 likely to have slightly more beneficial impacts than SC6, SC6RA1 and SC6RA3 over time.</p> <p>SC9, SC10, SC10RA2 &amp; SC10RA3 → high-quality design of development that respects, protects and enhances local character → enhancements to townscape character whilst protecting and enhancing the setting of heritage assets &amp; historic areas. SC10 likely to have impacts of slightly greater magnitude than its alternatives.</p> <p>SC7 &amp; its alternatives → development in the Green Belt → likely to involve development on greenfield &amp; open spaces → potential for negative impacts on distinct natural landscapes, character of small rural settlements. There could potentially be some impacts on the setting of nearby heritage assets and historic areas but there is a high degree of uncertainty on this. No discernible differences between SC7 or its alternatives for this SA Objective.</p> <p><b>Recommendations:</b> SC7 could seek to incorporate particularly stringent controls over the provision of GI and open space in proposals for development on Green Belt land in order to preserve character and setting.</p>
		SC6RA1	++	Bradford District	T/R	LT	L	
		SC6RA2	++	Bradford District	T/R	LT	H	
		SC6RA3	++	Bradford District	T/R	LT	H	
		SC7	-	Bradford District	T/R	LT	L	
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	++	Bradford District	T/R	LT	M	
		SC9	++	Bradford District	T/R	LT	M	
		SC10	++	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	++	Bradford District	T/R	LT	M	
SC10RA3	++	Bradford District	T/R	LT	M			
8. Cultural heritage		SC6	+	Bradford District	T/R	LT	M	
		SC6RA1	+	Bradford District	T/R	LT	L	
		SC6RA2	+	Bradford District	T/R	LT	H	
		SC6RA3	+	Bradford District	T/R	LT	H	
		SC7	?	Bradford District	T/R	LT	L	
		SC7RA1	?	Bradford District	T/R	LT	L	
		SC7RA2	?	Bradford District	T/R	LT	L	
		SC7RA3	?	Bradford District	T/R	LT	L	
		SC8	+	Bradford District	T/R	LT	M	
		SC9	++	Bradford District	T/R	LT	M	
SC10	++	Bradford District	T/R	LT	M			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement		
9. Air quality		SC10RA1	O	n/a	n/a	n/a	H	<p>SC6 and its alternatives SC8, SC9, SC10, SC10RA2 &amp; SC10RA3 → greenfield, habitats and GI protected and enhanced → protection and enhancement of air quality improvement ecosystem service. SC6RA2 potentially slightly greater positive impact than SC6, SC6RA1 7 SC6RA3.</p> <p>SC9, SC10, SC10RA2 &amp; SC10RA3 → encourage development that facilitates walking, cycling and public transport uptake + development that provides people with good access to key services and facilities → reduced travel times + more sustainable forms of movement → reduction in associated air pollution.</p> <p>SC10, SC10RA2 &amp; SC10RA3 → encourage development that minimises exposure of people to air pollution → likely to include mechanisms that both protect people from impacts of air pollution as well as mechanisms that improve air quality.</p> <p>SC10 likely to have impacts of a slightly greater magnitude than its alternatives.</p> <p>SC10RA1 → no discernible impacts on air quality or transport.</p> <p>SC6 and its alternatives, &amp; SC8 → no discernible impacts on transport.</p>		
		SC10RA2	++	Bradford District	T/R	LT	M			
		SC10RA3	++	Bradford District	T/R	LT	M			
			SC6	+	Bradford District	T/R	LT		M	
			SC6RA1	+	Bradford District	T/R	LT		L	
			SC6RA2	+	Bradford District	T/R	LT		H	
			SC6RA3	+	Bradford District	T/R	LT		H	
			SC7	-	Bradford District	T/R	LT		L	
			SC7RA1	-	Bradford District	T/R	LT		L	
			SC7RA2	-	Bradford District	T/R	LT		L	
			SC7RA3	-	Bradford District	T/R	LT		L	
			SC8	+	Bradford District	T/R	LT		M	
			SC9	++	Bradford District	T/R	LT		M	
	SC10	++	Bradford District	T/R	LT	M				
		SC10RA1	O	n/a	n/a	n/a	H			
		SC10RA2	++	Bradford District	T/R	LT	M			
		SC10RA3	++	Bradford District	T/R	LT	M			
10. Transport		SC6	O	n/a	n/a	n/a	H	<p>SC7 &amp; its alternatives → development in Green Belt → potential loss of greenfield land &amp; GI → reduction in their air quality improving ecosystem service. No discernible differences between SC7 or its alternatives for this SA Objective.</p> <p>SC7 &amp; its alternatives → development in Green Belt → potential for new homes to be in more rural locations that require longer distances to travel to access key services &amp; amenities + in locations where access to public transport modes is more limited.</p> <p><b>Recommendations:</b> SC7 could seek to prioritise Green Belt sites that have good walking &amp; cycling access.</p>		
		SC6RA1	O	n/a	n/a	n/a	H			
		SC6RA2	O	n/a	n/a	n/a	H			
		SC6RA3	O	n/a	n/a	n/a	H			
		SC7	-	Bradford District	T/R	LT	L			
		SC7RA1	-	Bradford District	T/R	LT	L			
		SC7RA2	-	Bradford District	T/R	LT	L			
		SC7RA3	-	Bradford District	T/R	LT	L			
		SC8	O	n/a	n/a	n/a	n/a		H	
		SC9	++	Bradford District	T/R	LT	M			
		SC10	++	Bradford District	T/R	LT	M			
				SC10RA1	O	n/a	n/a		n/a	H
				SC10RA2	++	Bradford District	T/R		LT	M
		SC10RA3	++	Bradford District	T/R	LT	M			
11. Housing		SC6	O	n/a	n/a	n/a	H	<p>SC6 and its alternatives, SC8 &amp; SC10RA1 → no discernible impacts.</p> <p>SC9, SC10, SC10RA2 &amp; SC10RA3 → encourage residential development + require proposals to ensure people can live comfortable, high-quality, safe and healthy lifestyles at home + require development to be accessible for</p>		
		SC6RA1	O	n/a	n/a	n/a	H			
		SC6RA2	O	n/a	n/a	n/a	H			
		SC6RA3	O	n/a	n/a	n/a	H			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		SC7	++	Bradford District	T/R	LT	M	people of all abilities. SC10 likely to have impacts of a slightly greater magnitude than its alternatives. SC10RA1 → no discernible impacts. SC7 & its alternatives → help to ensure that housing needs in Bradford can be met. SC7 & SC7RA1 would be likely to provide greater certainty over longer-term development needs being met. <b>Recommendations: None.</b>
		SC7RA1	++	Bradford District	T/R	LT	M	
		SC7RA2	+	Bradford District	T/R	LT	M	
		SC7RA3	+	Bradford District	T/R	LT	M	
		SC8	O	n/a	n/a	n/a	H	
		SC9	++	Bradford District	T/R	LT	M	
		SC10	++	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	++	Bradford District	T/R	LT	M	
SC10RA3	++	Bradford District	T/R	LT	M			
12. Range of accessible services		SC6	O	n/a	n/a	n/a	H	SC6 and its alternatives & SC8 → no discernible impacts on the range of accessible services. SC6 and its alternatives & SC8 → protection and enhancement of open spaces, GI and important habitats which are important areas for recreation, social interaction and cultural activities → boost to the cohesiveness of communities and the culture and leisure offering for visitors and local people. SC9, SC10, SC10RA2 & SC10RA3 → encourage proposals to provide well-connected networks for movement + inclusive & safe neighbourhoods + multi-functional greenspaces + provision of new health facilities → future residential development likely to facilitate social interaction, cohesive communities and enhanced access to services, facilities and cultural and recreational spaces and activities. SC10 likely to have impacts of a slightly greater magnitude than its alternatives. SC7 & its alternatives → development in Green Belt → potential for new homes to be situated relatively far from some key services, amenities, community facilities or employment areas. SC7 & its alternatives → development in Green Belt → expected that these new homes would still be within or adjacent to existing communities. No discernible differences between SC7 or its alternatives for this SA Objective.
		SC6RA1	O	n/a	n/a	n/a	H	
		SC6RA2	O	n/a	n/a	n/a	H	
		SC6RA3	O	n/a	n/a	n/a	H	
		SC7	-	Bradford District	T/R	LT	L	
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	O	n/a	n/a	n/a	H	
		SC9	++	Bradford District	T/R	LT	M	
		SC10	++	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
SC10RA2	++	Bradford District	T/R	LT	M			
SC10RA3	++	Bradford District	T/R	LT	M			
13. Social Cohesion		SC6	+	Bradford District	T/R	LT	M	SC10RA1 → no discernible impacts. <b>Recommendations: None.</b>
		SC6RA1	+	Bradford District	T/R	LT	L	
		SC6RA2	+	Bradford District	T/R	LT	H	
		SC6RA3	+	Bradford District	T/R	LT	H	
		SC7	+	Bradford District	T/R	LT	M	
		SC7RA1	+	Bradford District	T/R	LT	M	
		SC7RA2	+	Bradford District	T/R	LT	M	
		SC7RA3	+	Bradford District	T/R	LT	M	
		SC8	+	Bradford District	T/R	LT	M	
		SC9	++	Bradford District	T/R	LT	M	
		SC10	++	Bradford District	T/R	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
14. Culture & leisure		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	++	Bradford District	T/R	LT	M	
		SC10RA3	++	Bradford District	T/R	LT	M	
		SC6	+	Bradford District	T/R	LT	M	
		SC6RA1	+	Bradford District	T/R	LT	L	
		SC6RA2	+	Bradford District	T/R	LT	H	
		SC6RA3	+	Bradford District	T/R	LT	H	
		SC7	-	Bradford District	T/R	LT	L	
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	+	Bradford District	T/R	LT	M	
		SC9	++	Bradford District	T/R	LT	M	
		SC10	++	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
SC10RA2	++	Bradford District	T/R	LT	M			
SC10RA3	++	Bradford District	T/R	LT	M			
15. Safe & secure		SC6	O	n/a	n/a	n/a	H	<p>SC6 and its alternatives, SC7 and its alternatives, SC8 &amp; SC10RA1 → no discernible impacts.</p> <p>SC9, SC10, SC10RA2 &amp; SC10RA3 → encourage proposals to be of a high-quality design that encourage high rates of natural surveillance through increased walking and cycling rates → reduced risk of crime. SC10 likely to have impacts of a slightly greater magnitude than its alternatives.</p> <p>SC10, SC10RA2 &amp; SC10RA3 → require development to be designed in a manner that makes it safe, inclusive &amp; welcoming.</p> <p>SC10RA1 → no discernible impacts.</p> <p><b>Recommendations: None.</b></p>
		SC6RA1	O	n/a	n/a	n/a	H	
		SC6RA2	O	n/a	n/a	n/a	H	
		SC6RA3	O	n/a	n/a	n/a	H	
		SC7	O	n/a	n/a	n/a	H	
		SC7RA1	O	n/a	n/a	n/a	H	
		SC7RA2	O	n/a	n/a	n/a	H	
		SC7RA3	O	n/a	n/a	n/a	H	
		SC8	O	n/a	n/a	n/a	H	
		SC9	+	Bradford District	T/R	LT	M	
		SC10	++	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	++	Bradford District	T/R	LT	M	
SC10RA3	++	Bradford District	T/R	LT	M			
16. Health		SC6	+	Bradford District	T/R	LT	M	<p>SC6 and its alternatives → protected and enhanced greenfield, open spaces and habitats → improved access to outdoor physical activity opportunities (physical &amp; mental health benefits) and access to opportunities for spending time amongst semi-natural habitats (mental health benefits) for local people. SC6RA2 potentially slightly greater positive impact than SC6, SC6RA1 7 SC6RA3.</p> <p>SC9, SC10, SC10RA2 &amp; SC10RA3 → facilitate higher rates of active transport including walking and cycling →</p>
		SC6RA1	+	Bradford District	T/R	LT	L	
		SC6RA2	+	Bradford District	T/R	LT	H	
		SC6RA3	+	Bradford District	T/R	LT	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		SC7	+/-	Bradford District	T/R	LT	L	benefits to physical health.
		SC7RA1	+/-	Bradford District	T/R	LT	L	SC10, SC10RA2 & SC10RA3 → designed to ensure new development contributes towards health improvements and reducing health inequalities → new development likely to enable regular exercise, health eating, cleaner air, good access to health facilities, the provision of new health facilities and negative impacts on health to be avoided or mitigated. SC10 likely to have impacts of a slightly greater magnitude than its alternatives.
		SC7RA2	+/-	Bradford District	T/R	LT	L	
		SC7RA3	+/-	Bradford District	T/R	LT	L	
		SC8	O	n/a	n/a	n/a	H	
		SC9	+	Bradford District	T/R	LT	M	SC7 & its alternatives → new residential development in Green Belt → residents here potentially have more limited access to health services & facilities but would be likely to have excellent access to the countryside and a diverse range of natural habitats.
		SC10	++	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	SC8 & SC10RA1 → discernible impacts. <b>Recommendations: None.</b>
		SC10RA2	++	Bradford District	T/R	LT	M	
SC10RA3	++	Bradford District	T/R	LT	M			
17. Education		SC6	O	n/a	n/a	n/a	H	SC9, SC10, SC10RA2 & SC10R3 → highly accessible new developments via walking, cycling and public transport → residents and site users likely to have sustainable & convenient access to nearby education facilities.
		SC6RA1	O	n/a	n/a	n/a	H	
		SC6RA2	O	n/a	n/a	n/a	H	
		SC6RA3	O	n/a	n/a	n/a	H	
		SC7	-	Bradford District	T/R	LT	L	SC6 and its alternatives, SC8 & SC10RA1 → no discernible impacts.
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	SC7 and its alternatives → new residential development in the Green Belt → residents potentially have to reveal relatively long distances to access primary & secondary school facilities.
		SC7RA3	-	Bradford District	T/R	LT	L	
		SC8	O	n/a	n/a	n/a	H	
		SC9	+	Bradford District	T/R	LT	M	<b>Recommendations: SC7 could seek to ensure that proposals in the Green Belt have sustainable access to primary and secondary schools.</b>
		SC10	+	Bradford District	T/R	LT	M	
		SC10RA1	O	n/a	n/a	n/a	H	
		SC10RA2	+	Bradford District	T/R	LT	M	
SC10RA3	+	Bradford District	T/R	LT	M			
18. Employment		SC6	O	n/a	n/a	n/a	H	SC9, SC10, SC10RA2 & SC10R3 → highly accessible new developments via walking, cycling and public transport → residents and site users likely to have sustainable & convenient access to employment areas + & customers able to more sustainably and conveniently access businesses and shopping areas.
		SC6RA1	O	n/a	n/a	n/a	H	
		SC6RA2	O	n/a	n/a	n/a	H	
		SC6RA3	O	n/a	n/a	n/a	H	
		SC7	-	Bradford District	T/R	LT	L	SC10 → requires proposals to support the delivery of jobs and key services → boost to local employment opportunities and the local economy.
		SC7RA1	-	Bradford District	T/R	LT	L	
		SC7RA2	-	Bradford District	T/R	LT	L	
		SC7RA3	-	Bradford District	T/R	LT	L	SC6 and its alternatives, SC8 & SC10RA1 → no discernible impacts.
		SC8	O	n/a	n/a	n/a	H	
		SC9	+	Bradford District	T/R	LT	M	SC7 and its alternatives → new residential development in the Green Belt → residents potentially have to reveal
SC10	++	Bradford District	T/R	LT	M			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		SC10RA1	O	n/a	n/a	n/a	H	relatively long distances to employment areas. <b>Recommendations:</b> SC7 could seek to ensure that priority is given to Green Belt sites that are accessible and situated in proximity to employment areas.
		SC10RA2	++	Bradford District	T/R	LT	M	
		SC10RA3	++	Bradford District	T/R	LT	M	
19. Economy		SC6	0	n/a	n/a	n/a	H	
		SC6RA1	0	n/a	n/a	n/a	H	
		SC6RA2	0	n/a	n/a	n/a	H	
		SC6RA3	0	n/a	n/a	n/a	H	
		SC7	0	n/a	n/a	n/a	H	
		SC7RA1	0	n/a	n/a	n/a	H	
		SC7RA2	0	n/a	n/a	n/a	H	
		SC7RA3	0	n/a	n/a	n/a	H	
		SC8	0	Bradford District	T/R	LT	M	
		SC9	++	Bradford District	T/R	LT	M	
		SC10	++	Bradford District	T/R	LT	M	
		SC10RA1	0	n/a	n/a	n/a	H	
	SC10RA2	++	Bradford District	T/R	LT	M		
	SC10RA3	++	Bradford District	T/R	LT	M		

Summary of, and assumptions in the assessment of, all **Sub-Area Policies**

The sub area policies capture and summarise the plan's approach to development within the 4 sub areas and reflect policies elsewhere in the plan relating to housing and employment. They also explain the role and function of settlements (reflecting also the approach within Policy SC4), how areas are expected to change over the plan period and the Council's proposals for regeneration, investment and infrastructure, environmental protection and enhancement.

The sub area policies are being amended partly as a consequence of changes elsewhere relating to housing and employment need and distribution and also to reflect the Council's updated regeneration, transport and investment programmes.

**Policy BD1: The Regional City of Bradford** is under review. The Council's preferred option is to amend the policy in order to accommodate the revised housing requirements for the sub-area. BD1 sets out further detail on a commitment to Urban Eco Settlement ambitions, including sustainable buildings and cotemporary architecture supported by new cycleways, footways and improvements to public transport. The policy would seek to regenerate economic, environmental, physical and social conditions. It sets out various commitments for different parts of the sub-area, including the provision of new community facilities, infrastructure, open space, recreation facilities and employment opportunities to accompany the new housing as required in HO1 and HO3. The proposed policy would be expected to positively contribute to a range of SA Objectives due to the sustainability principles incorporated into new development, the opportunities for using PDL in the city, the enhancements to walking and cycling routes as well as public transport options (helping with air quality improvement targets, GHG emission reductions and accessibility to key areas for all people), as well as the character and setting of townscapes and heritage assets. BD1 includes various commitments related to transport, economic development and the environment. Of these, most pertinent to the SA are commitments to maximising non-car modes of transport; improvements to various bus and rail links; supporting significant economic development in the sub-area; enhancing the role of the Green Belt between Bradford and Leeds as a Country Park; enhancing the green infrastructure network in urban areas and along key public transport corridors to reduce flood risk and improve biodiversity; conserve and enhance heritage assets; and maximise renewable energy generation. As the policy has been updated to account for the revised development requirements in the sub-area, any alternative to this (i.e. an alternative that does not accommodate the sub-areas development requirements) could be considered to not be reasonable. BD1 would be expected to make a major contribution towards enhancing the sustainability of development the Regional City that is allocated in other policies in the CSPR as well as the Allocations DPD.

- **BD1 Reasonable Alternative 1 (BD1RA1):** The only alternative considered by the Council was to prepare a less extensive update to the policy. This approach would be highly likely to have largely similar results to the preferred option but potentially of a lower magnitude and with less certainty.

**Policy BD2: Investment Priorities for the City of Bradford** is under review. The policy has been reviewed and updated to ensure that it accommodates the development requirement for the sub-area. The Council consider that any alternative to this, i.e. one that does not accommodate the development requirements, would not be reasonable. The proposed policy would seek to ensure that investment improves public transport and enhances ease of movement; regenerates the public realm; provides new infrastructure to manage flood risk; takes advantage of training programmes in the City Centre and Leeds; delivers strategic highway and rail improvements; and supports an improved provision of high-speed broadband in the sub-area. BD2 would be expected to help reduce the need to travel and to reduce the pollution and emissions associated with local movements. The policy would also be likely to help reduce employment inequalities, to improve skills learning for local people and to protect and enhance the character and setting of the sub-area.

**Policy AD1: Airedale** is under review. The Council have reviewed and updated the policy in order to accommodate the revised housing requirement for the sub-area, as set out in HO1 and HO3. The settlements where the preferred option indicates there would be Green Belt change are Keighley, Steeton and Baildon, although the majority of Green Belt change would be at Keighley, with no Green Belt change at all other settlements in Airedale envisaged. The preferred option seeks to ensure that new development in Keighley would be supported by associated employment and community facilities, including those related to health, sports and shopping. Development would be comprehensive, regenerative and heritage-led where appropriate. Development in Bingley would be accompanied by employment, retail, and leisure schemes. Development in Silsden would be supported by new community facilities as well as good public transport, walking and cycling links. Development in Steeton and Eastburn would also be support by associated community facilities as well as good walking and cycling links. AD1 includes various commitments related to transport, economic development and the environment. Of these, most pertinent to the SA are commitments to maximising non-car travel and improving public transport; protecting and enhancing landscape character, habitats and species including those associated with the Pennine Uplands; protecting and enhancing the integrity of the South Pennine Moors SPA/SAC; improving GI along

the Airedale river; protecting and enhancing river corridors; encouraging efforts to increase tree cover; conserving and enhancing heritage assets; and maximising renewable energy generation and energy efficiency. Overall, AD1 would be expected to help ensure that new and existing residents of Airedale have good access to walking, cycling and public transport links as well as key services, amenities and facilities as well as employment opportunities. The policy has been reviewed and updated to ensure that it accommodates the housing requirement for the sub-area.

- **AD1 Reasonable Alternative 1 (AD1RA1):** The only alternative considered by the Council was to prepare a less extensive update to the policy. This approach would be highly likely to have largely similar results to the preferred option but potentially of a lower magnitude and with less certainty.

**Policy AD2: Investment Priorities for Airedale** is under review. In order to deliver transformation and change in Airedale through economic development, housing renewal and growth as well as improved green infrastructure, community facilities and accessibility, the preferred option would seek to ensure that public and private sector investment is targeted towards improving the quality and capacity of public transport; regenerating Keighley and Bingley town centres; infrastructure for supporting site assembly and managing flood risk; renewal of urban sites; release of Green Belt in sustainable locations that meet accessibility standards (including accessibility via walking, cycling and public transport); development and extension of high-speed broadband, particularly in rural areas; and working with Yorkshire Water and the EA to understand full the water and waste water infrastructure requirements for future development. AD2 would be expected to lead to significant positive impacts on SA Objectives related to economy, employment, accessibility and cohesive communities. The proposed policy would also assist with Bradford's transition towards a more sustainable transport sector. The focus on regenerating urban and brownfield sites would constitute a highly efficient use of land, although this could be countered to some extent by any release of Green Belt land. The proposed limited release of Green Belt sites could also pose a risk to the biodiversity, character and setting of these areas.

- **AD2 Reasonable Alternative 1 (AD2RA1):** The only alternative available to the Council is a less extensive update to the Policy, although this would risk the Policy not being aligned with other updates made to the Plan. This alternative would be likely to have largely similar impacts to the preferred option but of a lower magnitude and, given the uncertainty behind the contents of this option, with a lower probability.

**Policy WD1: Wharfedale** is under review. The Council's preferred option would see development in Ilkley involve Green Belt release in sustainable locations with community facilities provided for (in particular, new schools, open space and recreation facilities in order to address deficiencies). Addingham would see new small-scale residential development in sustainable Green Belt locations accompanied by associated community facilities. The preferred option would lead to significant Green Belt release at Burley but no Green Belt release at Menston, although at both locations development would be accompanied by new community facilities. WD2 would help to ensure that local development needs are met whilst the development is relatively sustainable. The policy includes various commitments related to transport, economic development and the environment. Of these, most pertinent to the SA are commitments to maximising non-car modes of transport and improving public transport; delivering significant economic growth and high-quality employment land in towns and centres; protecting and enhancing the cultural, heritage, ecological, archaeological and landscape significance of Rombald's Ridge; protecting land in the South Pennine Moors SPA Zone of Influence and recognising the importance of various local habitats. These commitments would be likely to help enhance the sustainability of the development allocated in the sub-area through other policies in the CSPR as well as the Allocations DPD. The range of services accessible to local people is likely to be enhanced whilst new and existing residents would have good access to public transport options as well as walking and cycling links. There is extensive flood risk in the Wharfedale region associated with the Wharfe and there is a risk that some new development would be exposed to this. It is unclear if the development in Green Belt locations, which would be likely to lead to the loss of greenfield land, would have the potential to alter local flood risk. The Wharfedale sub-area also sits just south of the Nidderdale AONB. Given that new development would be situated within existing settlements, impacts on views from the AONB are considered to be unlikely. The proposed policy has been reviewed and updated in order to ensure that it accommodates the housing requirement for the sub-area.

- **WD1 Reasonable Alternative 1 (WD1RA1):** The only alternative considered by the Council was to prepare a less extensive update to the policy. This approach would be highly likely to have largely similar results to the preferred option but potentially of a lower magnitude and with less certainty.

**Policy WD2: Investment Priorities for Wharfedale** is under review. The preferred option would seek to help deliver transformation and change in Wharfedale through economic development, housing growth, improved green infrastructure, improved accessibility and enhanced community facilities. This would be achieved by directing investment in the region towards improving the quality & capacity of public transport; town centre enhancements; infrastructure to support assembly & flood risk management;

and high-speed broadband. WD2 would be expected to help contribute towards a more competitive and successful local economy in Wharfedale as well as the transition towards a more efficient and sustainable transport sector. Improved internet speeds could help to reduce the need to travel. Enhancing community facilities as well as general accessibility in the sub-area would be likely to contribute towards more cohesive communities, an improved cultural and leisure offering and greater accessibility of services. Improving the accessibility of jobs would be expected to enhance local people’s employment prospects. Directing investment towards providing infrastructure for site assembly and food risk management should help to ensure local development needs are met whilst climate change resilience is enhanced.

- **WD2 Reasonable Alternative 1 (WD2RA1):** The only alternative available to the Council is a less extensive update to the Policy, although this would risk the Policy not being aligned with other updates made to the Plan. This alternative would be likely to have largely similar impacts to the preferred option but of a lower magnitude and, given the uncertainty behind the contents of this option, with a lower probability.

**Policy PN1: South Pennine Towns and Villages** is under review. The Council’s preferred option sets out detailed requirements for development in the region, including for affordable housing, transport and the environment. In particular, the Council would seek to ensure that new development maximises opportunities for non-car travel and for improving public transport. PN1 also seeks to ensure that biodiversity, including ecological integrity, landscape character and heritage value is protected and enhanced. The sub-area is in proximity to the South Pennine Moors SAC/SPA, an international biodiversity designation with a highly distinctive landscape character. Most development would be directed towards the settlements of Queensbury, Thornton, Denholme, Cullingworth and Haworth which are all approximately 2km from the biodiversity designations and so direct negative impacts are considered to be unlikely. New development in these small settlements would be likely to result in the loss of greenfield land but PN1 would be expected to help ensure that the development makes a positive contribution to the local character, setting and society whilst providing a boost to the local economy and mitigating potential impacts on biodiversity. Access to public transport is also relatively good in these locations, although residents may need to travel somewhat longer distances to access some services, amenities and employment areas given the size of these settlements. The proposed policy has been reviewed and updated in order to ensure that it accommodates the housing requirement for the sub-area.

- **PN1 Reasonable Alternative 1 (PN1RA1):** The only alternative considered by the Council was to prepare a less extensive update to the policy. This approach would be highly likely to have largely similar results to the preferred option but potentially of a lower magnitude and with less certainty.

**Policy PN2: Investment Priorities for the Pennine Towns and Villages** is not under review. The proposed policy would seek to ensure that change in the Pennine Towns and Villages is managed to be of a scale that meets local needs for housing, employment, green infrastructure, heritage, community and sustainable transport. This would be achieved by a partnership between public and private sectors, stakeholder bodies and local communities focussing on improving public transport, improving accessibility of jobs, managing flood risk, encouraging locally based enterprises, supporting retail and leisure development particularly where it involves the re-use of an existing building, enhancing the moorland setting, character and historical value and extending high-speed broadband. PN2 would be likely to contribute towards a range of positive sustainability impacts for the sub-area with some discernible on a district-wide scale, including positive impacts on transport and the associated pollution and GHG emissions, climate change resilience, landscapes, cultural heritage, employment and economy.

- **PN2 Reasonable Alternative 1 (PN2RA1):** The only alternative available to the Council is a less extensive update to the Policy, although this would risk the Policy not being aligned with other updates made to the Plan. This alternative would be likely to have largely similar impacts to the preferred option but of a lower magnitude and, given the uncertainty behind the contents of this option, with a lower probability.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		BD1	+/-	Bradford District	P/I	LT	M	BD1, AD1, WD1 & PN1 → enhancements to public transport, walking & cycling options → positive contribution to transition towards lower-carbon travel.
		BD1RA1	+/-	Bradford District	P/I	LT	L	

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob	Summary of effects Recommendations for avoidance, mitigation or enhancement
1. Energy & GHGs		BD2	+/-	Bradford District	P/I	LT	M	<p>BD1, AD1, WD1 → maximise opportunities for renewable energy generation &amp; energy efficiency.</p> <p>All policies → support and facilitate significant residential &amp; economic growth → potential for increase in associated energy consumption &amp; transport.</p> <p>BD2, AD2, WD2 &amp; PN2 → enhancements to quality &amp; capacity of public transport + investments in high-speed broadband → greater uptake of more sustainable travel + reduced need to travel → mitigates GHG emissions. Their alternatives would be likely to have similar impacts but potentially of a lower magnitude and probability.</p> <p>All reasonable alternatives → similar impacts to preferred options but less certainty.</p> <p><b>Recommendations: None.</b></p>
		AD1	+/-	Bradford District	P/I	LT	M	
		AD1RA1	+/-	Bradford District	P/I	LT	L	
		AD2	+/-	Bradford District	P/I	LT	M	
		AD2RA1	+/-	Bradford District	P/I	LT	L	
		WD1	+/-	Bradford District	P/I	LT	M	
		WD1RA1	+/-	Bradford District	P/I	LT	L	
		WD2	+/-	Bradford District	P/I	LT	M	
		WD2RA1	+/-	Bradford District	P/I	LT	L	
		PN1	+/-	Bradford District	P/I	LT	M	
		PN1RA1	+/-	Bradford District	P/I	LT	L	
		PN2	+/-	Bradford District	P/I	LT	M	
PN2RA1	+/-	Bradford District	P/I	LT	L			
2. Waste		BD1	+	Bradford District	T/R	LT	L	<p>BD1 → good opportunities for using PDL → potentially helps to limited waste associated with construction.</p> <p>BD1RA1 → similar impacts to BD1 but even less certainty.</p> <p>BD2, AD1, AD2, WD1, WD2, PN1, PN2 and their alternatives → no discernible impacts.</p> <p><b>Recommendations: All sub-area policies could potentially consider maximising opportunities for using PDL and re-using existing buildings.</b></p>
		BD1RA1	+	Bradford District	T/R	LT	L	
		BD2	○	n/a	n/a	n/a	H	
		AD1	○	n/a	n/a	n/a	H	
		AD1RA1	○	n/a	n/a	n/a	H	
		AD2	○	n/a	n/a	n/a	H	
		AD2RA1	○	n/a	n/a	n/a	H	
		WD1	○	n/a	n/a	n/a	H	
		WD1RA1	○	n/a	n/a	n/a	H	
		WD2	○	n/a	n/a	n/a	H	
		WD2RA1	○	n/a	n/a	n/a	H	
		PN1	○	n/a	n/a	n/a	H	
PN1RA1	○	n/a	n/a	n/a	H			
PN2	○	n/a	n/a	n/a	H			
PN2RA1	○	n/a	n/a	n/a	H			
3. Land & buildings		BD1	+	Bradford City	T/R	LT	L	<p>BD1 → good opportunities for using PDL &amp; existing buildings.</p> <p>AD2 → investment directed towards regenerating urban &amp; brownfield sites + limited release of Green Belt sites in sustainable locations → positive and negative impacts on the land resource.</p> <p>AD1, WD1 &amp; PN1 → Green Belt release → likely to result in loss of greenfield land.</p>
		BD1RA1	+	Bradford City	P/I	LT	L	
		BD2	○	n/a	n/a	n/a	H	
		AD1	-	Airedale sub-area	P/I	LT	M	
		AD1RA1	-	Airedale sub-area	P/I	LT	L	
		AD2	+/-	Airedale sub-area	P/I	LT	M	
AD2RA1	+/-	Airedale sub-area	P/I	LT	L			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>	
		WD1	-	Wharfedale sub-area	P/I	LT	M	PN2 → encourages re-use of existing buildings → efficient management of land/building resource. All reasonable alternatives → similar impacts to preferred options but less certainty and potentially slightly lower magnitude. WD2 & BD2 → no discernible impacts. <b>Recommendations:</b> AD1, WD1 & PN1 could seek to ensure development is not on BMV soils.	
		WD1RA1	-	Wharfedale sub-area	P/I	LT	L		
		WD2	○	n/a	n/a	n/a	n/a		H
		WD2RA1	○	n/a	n/a	n/a	n/a		H
		PN1	-	Pennines sub-area	P/I	LT	M		
		PN1RA1	-	Pennines sub-area	P/I	LT	L		
		PN2	+	Pennines sub-area	P/I	LT	M		
4. Climate change vulnerability		BD1	++	Bradford City	T/R	LT	L	BD1, AD1 & PN1 → uncertain on precise location of development in relation to flood zones. All reasonable alternatives → similar impacts to preferred options but less certainty & lower magnitude. WD1 → extensive flood risk in the region + development likely to result in loss of Green Belt greenfields → potential for altering flood risk. AD2, WD2 & PN2 → investment directed towards managing flood risk → enhanced climate change resilience. Their alternatives would be likely to have similar impacts but potentially of a lower magnitude and probability. BD1, AD1, WD1 & PN1 → commitment towards enhancing GI cover → help to reduce flood risk. In particular, BD1 seeks to enhance the GI network to reduce flood risk. <b>Recommendations:</b> Given the flood risk present in the Wharfedale sub-area, WD1 could seek to ensure upslope greenfield & GI is protected from development & for the GI network to be managed to reduce flood risk.	
		BD1RA1	+	Bradford City	T/R	LT	L		
		BD2	+	Bradford City	T/R	LT	H		
		AD1	?	Airedale sub-area	T/R	LT	L		
		AD1RA1	?	Airedale sub-area	T/R	LT	L		
		AD2	+	Airedale sub-area	T/R	LT	H		
		AD2RA1	+	Airedale sub-area	T/R	LT	L		
		WD1	-	Wharfedale sub-area	T/R	LT	L		
		WD1RA1	-	Wharfedale sub-area	T/R	LT	L		
		WD2	+	Wharfedale sub-area	T/R	LT	H		
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L		
		PN1	?	Pennines sub-area	T/R	LT	L		
		PN1RA1	?	Pennines sub-area	T/R	LT	L		
PN2	+	Pennines sub-area	T/R	LT	H				
PN2RA1	+	Pennines sub-area	T/R	LT	L				
5. Water		BD1	+/-	Bradford City	T/R	LT	L	BD1, WD1, AD1 & PN1 → commitment to protecting & enhancing GI and habitats → help to protect and enhance water quality. All alternatives have similar effects but less certainty and likely lower magnitudes. WD1, AD1 & PN1 → development in Green Belt → likely loss of greenfield → potential impacts on water quality. BD1, WD1, AD1 & PN1 → encourage & facilitate major growth → potential net increase in water consumption. AD2 → investment directed towards working with Yorkshire Water & the EA to ensure water & wastewater infrastructure requirements are provided for. AD2RA1 → similar impacts to preferred option but likely slightly lower magnitude with less certainty.	
		BD1RA1	+/-	Bradford City	T/R	LT	L		
		BD2	○	n/a	n/a	n/a	n/a		H
		AD1	+/-	Airedale sub-area	P/I	LT	L		
		AD1RA1	+/-	Airedale sub-area	P/I	LT	L		
		AD2	+	Airedale sub-area	T/R	LT	M		
		AD2RA1	+	Airedale sub-area	T/R	LT	L		
		WD1	+/-	Wharfedale sub-area	P/I	LT	L		
		WD1RA1	+/-	Wharfedale sub-area	P/I	LT	L		
		WD2	○	n/a	n/a	n/a	n/a		H
		WD2RA1	○	n/a	n/a	n/a	n/a		H
PN1	+/-	Pennines sub-area	P/I	LT	L				

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		PN1RA1	+/-	Pennines sub-area	P/I	LT	L	BD2, WD2 & PN2 and their alternatives → no discernible impacts. <b>Recommendations: Policies seek to ensure SuDS are incorporated into new development.</b>
		PN2	○	n/a	n/a	n/a	H	
		PN2RA1	○	n/a	n/a	n/a	H	
6. Biodiversity & geodiversity		BD1	+	Bradford City	T/R	LT	L	AD1, WD1 & AD2 → investment & development directed towards limited release of Green Belt sites in sustainable locations → potential for negative impacts on biodiversity & ecological connectivity due to loss of greenfields in countryside locations. BD2, AD2, PN2 & WD2 → investment directed towards improvement green infrastructure → enhanced biodiversity value & ecological connectivity. BD1, WD1, AD1 & PN1 → development likely to protect and enhance biodiversity & ecological connectivity. All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes. PN2 → working partnerships for enhancing the moorland setting & character → potential to enhance the biodiversity value of the Moors. <b>Recommendations: Sub-area policies could seek to ensure there is a net increase in tree canopy cover.</b>
		BD1RA1	+	Bradford City	T/R	LT	L	
		BD2	+	Bradford City	T/R	LT	L	
		AD1	+/-	Airedale sub-area	T/R	LT	L	
		AD1RA1	+/-	Airedale sub-area	T/R	LT	L	
		AD2	+/-	Airedale sub-area	T/R	LT	L	
		AD2RA1	+/-	Airedale sub-area	T/R	LT	L	
		WD1	+/-	Wharfedale sub-area	T/R	LT	L	
		WD1RA1	+/-	Wharfedale sub-area	T/R	LT	L	
		WD2	+	Wharfedale sub-area	T/R	LT	L	
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L	
		PN1	+	Pennines sub-area	T/R	LT	L	
		PN1RA1	+	Pennines sub-area	T/R	LT	L	
PN2	+	Pennines sub-area	T/R	LT	L			
PN2RA1	+	Pennines sub-area	T/R	LT	L			
7. Landscape & townscape		BD1	+	Bradford City	T/R	LT	L	AD1 & WD1 → development on Green Belt & greenfield → potential for impacts on character & setting. AD2 → investment directed towards limited release of Green Belt sites in sustainable locations → potential for negative impacts on character & setting due to loss of greenfields in countryside locations but likely to be limited due to focus on regenerating urban & brownfield sites. Regenerating brownfield sites → positive impacts on character & setting. All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes. WD2 → investment directed towards improvement green infrastructure → potential for enhancing the local character as well as the setting of nearby heritage assets or historic areas. BD1 → development in regional city likely to conform with surrounding area and to enhance the character & setting.
		BD1RA1	+	Bradford City	T/R	LT	L	
		BD2	+	Bradford City	T/R	LT	L	
		AD1	+/-	Airedale sub-area	T/R	LT	L	
		AD1RA1	+/-	Airedale sub-area	T/R	LT	L	
		AD2	+/-	Airedale sub-area	T/R	LT	L	
		AD2RA1	+/-	Airedale sub-area	T/R	LT	L	
		WD1	+/-	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	+/-	Wharfedale sub-area	T/R	LT	L	
		WD2	+	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L	
		PN1	+	Pennines sub-area	T/R	LT	M	
		PN1RA1	+	Pennines sub-area	T/R	LT	L	
PN2	++	Pennines sub-area	T/R	LT	M			
PN2RA1	++	Pennines sub-area	T/R	LT	L			
		BD1	+	Bradford City	T/R	LT	L	
		BD1RA1	+	Bradford City	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
8. Cultural heritage		BD2	+	Bradford City	T/R	LT	L	PN2 → working partnerships for enhancing the moorland setting & character → distinctive character of natural landscapes & distinctive heritage assets and historic landscapes protected & enhanced.  PN1 → seeks to ensure that new development protects and enhances character and the setting of historic areas & heritage assets.  BD1, AD1, WD1 & PN1 → development likely to be high-quality design that respects, protects and enhances the local character and setting  <b>Recommendations:</b> <i>Development on greenfield sites should incorporate extensive GI and open space.</i>
		AD1	+/-	Airedale sub-area	T/R	LT	L	
		AD1RA1	+/-	Airedale sub-area	T/R	LT	L	
		AD2	+/-	Airedale sub-area	T/R	LT	L	
		AD2RA1	+/-	Airedale sub-area	T/R	LT	L	
		WD1	+/-	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	+/-	Wharfedale sub-area	T/R	LT	L	
		WD2	+	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L	
		PN1	+	Pennines sub-area	T/R	LT	M	
		PN1RA1	+	Pennines sub-area	T/R	LT	L	
		PN2	++	Pennines sub-area	T/R	LT	M	
PN2RA1	++	Pennines sub-area	T/R	LT	L			
9. Air quality		BD1	++	Bradford City	T/R	LT	M	AD2 → new sites required to be accessible via walking and cycling → increase uptake of more sustainable forms of movement in the sub-areas → mitigates GHG emissions associated with transport sector in Bradford.  BD1, AD1, WD1, PN1 → seek to enhance public transport modes → more sustainable travel & reduction in transport associated emissions.  BD1, AD2, WD2 & PN2 → enhancements to quality & capacity of public transport + investments in high-speed broadband → greater uptake of more sustainable travel + reduced need to travel → mitigates GHG emissions associated with travel.  All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes.
		BD1RA1	+	Bradford City	T/R	LT	L	
		BD2	+	Bradford City	T/R	LT	M	
		AD1	+	Airedale sub-area	T/R	LT	M	
		AD1RA1	+	Airedale sub-area	T/R	LT	L	
		AD2	+	Airedale sub-area	T/R	LT	M	
		AD2RA1	+	Airedale sub-area	T/R	LT	L	
		WD1	+	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	+	Wharfedale sub-area	T/R	LT	L	
		WD2	+	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L	
		PN1	+	Pennines sub-area	T/R	LT	M	
PN1RA1	+	Pennines sub-area	T/R	LT	L			
PN2	+	Pennines sub-area	T/R	LT	M			
PN2RA1	+	Pennines sub-area	T/R	LT	L			
10. Transport		BD1	++	Bradford City	T/R	LT	M	BD1, AD1, WD1 → residents only need to travel short distances to access services, amenities and employment areas, particularly as policies seek to enhance the local provision of these → reduced need to travel.  <b>Recommendations:</b> <i>The GI network could be strategically managed and located in a way that helps to mitigate air pollution arising from key sources, such as strategic roads.</i>
		BD1RA1	++	Bradford City	T/R	LT	L	
		BD2	++	Bradford City	T/R	LT	M	
		AD1	++	Airedale sub-area	T/R	LT	M	
		AD1RA1	++	Airedale sub-area	T/R	LT	L	
		AD2	++	Airedale sub-area	T/R	LT	M	
		AD2RA1	++	Airedale sub-area	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob	Summary of effects Recommendations for avoidance, mitigation or enhancement
		WD1	++	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	++	Wharfedale sub-area	T/R	LT	L	
		WD2	++	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	++	Wharfedale sub-area	T/R	LT	L	
		PN1	++	Pennines sub-area	T/R	LT	M	
		PN1RA1	++	Pennines sub-area	T/R	LT	L	
		PN2	++	Pennines sub-area	T/R	LT	M	
		PN2RA1	++	Pennines sub-area	T/R	LT	L	
11. Housing		BD1	++	Bradford District	T/R	LT	M	PN2 → development in Pennines sub-area managed to ensure it's of appropriate scale for local area → local needs more likely to be met.  BD1, AD2 & WD2 → investments directed towards ensuring land & infrastructure is available for new homes.  BD1, AD1, WD1 & PN1 → help to ensure that local housing needs are met including affordable housing needs.  All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes. <b>Recommendations: None.</b>
		BD1RA1	++	Bradford District	T/R	LT	L	
		BD2	+	Bradford District	T/R	LT	M	
		AD1	++	Bradford District	T/R	LT	M	
		AD1RA1	++	Bradford District	T/R	LT	L	
		AD2	+	Bradford District	T/R	LT	M	
		AD2RA1	+	Bradford District	T/R	LT	L	
		WD1	++	Bradford District	T/R	LT	M	
		WD1RA1	++	Bradford District	T/R	LT	L	
		WD2	+	Bradford District	T/R	LT	M	
		WD2RA1	+	Bradford District	T/R	LT	L	
		PN1	++	Bradford District	T/R	LT	M	
		PN1RA1	++	Bradford District	T/R	LT	L	
PN2	+	Bradford District	T/R	LT	M			
PN2RA1	+	Bradford District	T/R	LT	L			
12. Range of accessible services		BD1	++	Bradford City	T/R	LT	M	BD2, AD2, WD2 & PN2 → investments directed towards town centre regeneration including enhancements to public realm, retail & leisure + enhancing ease of movement & accessibility particularly for disadvantaged people → improved access to services & amenities + more cohesive communities + enhanced culture & leisure offering in the sub-areas.  PN2 → encourages locally based enterprises & initiatives that develop community resilience.  All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes.
		BD1RA1	++	Bradford City	T/R	LT	L	
		BD2	++	Bradford City	T/R	LT	M	
		AD1	++	Airedale sub-area	T/R	LT	M	
		AD1RA1	++	Airedale sub-area	T/R	LT	L	
		AD2	++	Airedale sub-area	T/R	LT	M	
		AD2RA1	++	Airedale sub-area	T/R	LT	L	
		WD1	++	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	++	Wharfedale sub-area	T/R	LT	L	
		WD2	++	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	++	Wharfedale sub-area	T/R	LT	L	
PN1	++	Pennines sub-area	T/R	LT	M	BD1 → new residents in Bradford city likely to have excellent access to diverse range of services, amenities,		

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		PN1RA1	++	Pennines sub-area	T/R	LT	L	facilities, cultural areas and communal spaces.  BD1, AD1, WD1 & PN1 → seek to ensure that new community facilities are delivered along with new development → enhanced accessibility for new and existing residents.  <b>Recommendations: None.</b>
		PN2	++	Pennines sub-area	T/R	LT	M	
		PN2RA1	++	Pennines sub-area	T/R	LT	L	
13. Social Cohesion		BD1	++	Bradford City	T/R	LT	M	
		BD1RA1	++	Bradford City	T/R	LT	L	
		BD2	++	Bradford City	T/R	LT	M	
		AD1	++	Airedale sub-area	T/R	LT	M	
		AD1RA1	++	Airedale sub-area	T/R	LT	L	
		AD2	++	Airedale sub-area	T/R	LT	M	
		AD2RA1	++	Airedale sub-area	T/R	LT	L	
		WD1	++	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	++	Wharfedale sub-area	T/R	LT	L	
		WD2	++	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	++	Wharfedale sub-area	T/R	LT	L	
		PN1	++	Pennines sub-area	T/R	LT	M	
		PN1RA1	++	Pennines sub-area	T/R	LT	L	
PN2	++	Pennines sub-area	T/R	LT	M			
PN2RA1	++	Pennines sub-area	T/R	LT	L			
14. Culture & leisure		BD1	++	Bradford City	T/R	LT	M	
		BD1RA1	++	Bradford City	T/R	LT	L	
		BD2	++	Bradford City	T/R	LT	M	
		AD1	++	Airedale sub-area	T/R	LT	M	
		AD1RA1	++	Airedale sub-area	T/R	LT	L	
		AD2	++	Airedale sub-area	T/R	LT	M	
		AD2RA1	++	Airedale sub-area	T/R	LT	L	
		WD1	++	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	++	Wharfedale sub-area	T/R	LT	L	
		WD2	++	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	++	Wharfedale sub-area	T/R	LT	L	
		PN1	++	Pennines sub-area	T/R	LT	M	
		PN1RA1	++	Pennines sub-area	T/R	LT	L	
PN2	++	Pennines sub-area	T/R	LT	M			
PN2RA1	++	Pennines sub-area	T/R	LT	L			
		BD1	+	Bradford City	T/R	LT	L	BD1, AD1, WD1 & PN1 → help to ensure local housing needs met & development is of high quality → reduced deprivation, poverty & inequality + safe and secure lives at home.
		BD1RA1	+	Bradford City	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
15. Safe and secure		BD2	+	Bradford City	T/R	LT	L	<p>AD2 &amp; WD2 → investments directed towards ensuring land available for new homes &amp; improving accessibility of jobs → contribution towards a reduction in poverty, deprivation or inequality in the sub-area → enable safer &amp; more securer lifestyles for local people.</p> <p>All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes. PN2 → partnerships for ensuring local development needs can be met → contribution towards a reduction in poverty, deprivation or inequality in the sub-area → enable safer &amp; more securer lifestyles for local people.</p> <p><b>Recommendations: None.</b></p>
		AD1	+	Airedale sub-area	T/R	LT	L	
		AD1RA1	+	Airedale sub-area	T/R	LT	L	
		AD2	+	Airedale sub-area	T/R	LT	L	
		AD2RA1	+	Airedale sub-area	T/R	LT	L	
		WD1	+	Wharfedale sub-area	T/R	LT	L	
		WD1RA1	+	Wharfedale sub-area	T/R	LT	L	
		WD2	+	Wharfedale sub-area	T/R	LT	L	
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L	
		PN1	+	Pennines sub-area	T/R	LT	L	
		PN1RA1	+	Pennines sub-area	T/R	LT	L	
		PN2	+	Pennines sub-area	T/R	LT	L	
PN2RA1	+	Pennines sub-area	T/R	LT	L			
16 Health		BD1	+	Bradford City	T/R	LT	M	<p>AD2 &amp; WD2 → investments directed towards ensuring land available for homes &amp; improving accessibility of jobs → contribution towards a reduction in poverty, deprivation or inequality in the sub-area → healthier lives at home.</p> <p>BD2, AD2, WD2 &amp; PN2 → enhanced accessibility, particularly for disadvantaged community, could enhance accessibility of health facilities + improvements to active travel routes → health benefits.</p> <p>BD1, WD1 &amp; AD1 → new residents likely to have good access to existing health facilities.</p> <p>WD1, AD1 &amp; PN1 → people likely to have excellent access to countryside &amp; diverse range of habitats.</p> <p>All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes.</p> <p><b>Recommendations: None.</b></p>
		BD1RA1	+	Bradford City	T/R	LT	L	
		BD2	+	Bradford City	T/R	LT	M	
		AD1	+	Airedale sub-area	T/R	LT	M	
		AD1RA1	+	Airedale sub-area	T/R	LT	L	
		AD2	+	Airedale sub-area	T/R	LT	M	
		AD2RA1	+	Airedale sub-area	T/R	LT	L	
		WD1	+	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	+	Wharfedale sub-area	T/R	LT	L	
		WD2	+	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L	
		PN1	?	Pennines sub-area	T/R	LT	L	
PN1RA1	?	Pennines sub-area	T/R	LT	L			
PN2	+	Pennines sub-area	T/R	LT	L			
PN2RA1	+	Pennines sub-area	T/R	LT	L			
17. Education		BD1	+	Bradford City	T/R	LT	M	<p>BD2, AD2, WD2 &amp; PN2 → investment directed towards enhanced accessibility of employment areas + economic regeneration → enhanced skills learning opportunities for local people.</p> <p>All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes.</p>
		BD1RA1	+	Bradford City	T/R	LT	L	
		BD2	+	Bradford City	T/R	LT	L	
		AD1	+	Airedale sub-area	T/R	LT	M	
		AD1RA1	+	Airedale sub-area	T/R	LT	L	
		AD2	+	Airedale sub-area	T/R	LT	M	
AD2RA1	+	Airedale sub-area	T/R	LT	L			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		WD1	++	Wharfedale sub-area	T/R	LT	M	BD1 & AD1 → new residents likely to have good access to existing education facilities.  WD1 → provision of new education facilities.  PN1 → some residents may need to travel relatively far to access schools but this is largely uncertain.  <b>Recommendations: None.</b>
		WD1RA1	++	Wharfedale sub-area	T/R	LT	L	
		WD2	+	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	+	Wharfedale sub-area	T/R	LT	L	
		PN1	?	Pennines sub-area	T/R	LT	L	
		PN1RA1	?	Pennines sub-area	T/R	LT	L	
		PN2	+	Pennines sub-area	T/R	LT	M	
18. Employment		BD1	++	Bradford City	T/R	LT	M	BD2, AD2, WD2 & PN2 → investment directed towards enhanced accessibility of employment areas, particularly for disadvantaged community → improved employment prospects for local people + reduced employment inequalities.  AD2 & WD2 → investment directed towards regenerating town centres + more efficient movement + high speed broadband → significant boost towards local economy.  PN2 → supports sustainable economic, retail & leisure development of an appropriate scale → enhanced employment opportunities + boost to economy in local sub-area.  BD1, AD1, WD1, PN1 → good public transport access + development accompanied by new employment development → new and existing residents would have good access to diverse range of employment opportunities in the sub-areas.
		BD1RA1	++	Bradford City	T/R	LT	L	
		BD2	++	Bradford City	T/R	LT	M	
		AD1	++	Airedale sub-area	T/R	LT	M	
		AD1RA1	++	Airedale sub-area	T/R	LT	L	
		AD2	++	Airedale sub-area	T/R	LT	M	
		AD2RA1	++	Airedale sub-area	T/R	LT	L	
		WD1	++	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	++	Wharfedale sub-area	T/R	LT	L	
		WD2	++	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	++	Wharfedale sub-area	T/R	LT	L	
		PN1	++	Pennines sub-area	T/R	LT	M	
		PN1RA1	++	Pennines sub-area	T/R	LT	L	
19. Economy		BD1	++	Bradford City	T/R	LT	M	BD1, AD1, WD1, PN1 → new residential development accompanied by mix use and economic development that is of a type and scale specifically targeted towards the sub-area → major boost to the economy of the local sub-areas.  All reasonable alternatives have similar effects as preferred options but less certainty and likely lower magnitudes.  <b>Recommendations: None.</b>
		BD1RA1	++	Bradford City	T/R	LT	L	
		BD2	++	Bradford City	T/R	LT	M	
		AD1	++	Airedale sub-area	T/R	LT	M	
		AD1RA1	++	Airedale sub-area	T/R	LT	L	
		AD2	++	Airedale sub-area	T/R	LT	M	
		AD2RA1	++	Airedale sub-area	T/R	LT	L	
		WD1	++	Wharfedale sub-area	T/R	LT	M	
		WD1RA1	++	Wharfedale sub-area	T/R	LT	L	
		WD2	++	Wharfedale sub-area	T/R	LT	M	
		WD2RA1	++	Wharfedale sub-area	T/R	LT	L	
	PN1	++	Pennines sub-area	T/R	LT	M		

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		PN1RA1	++	Pennines sub-area	T/R	LT	L	
		PN2	++	Pennines sub-area	T/R	LT	M	
		PN2RA1	++	Pennines sub-area	T/R	LT	L	

Summary of, and assumptions in the assessment of, all Thematic Policies: Economy

**Policy EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region** is under review. The Council's preferred option would be to support four key opportunities for creating a more successful and competitive local economy, including a focus on the young and enterprising population (e.g. enhancing skills learning and supporting small businesses); regenerating the city centre through investment prioritisation whilst supporting opportunities for businesses related to the District's unique environmental assets; identifying the growth potential of different locations and different business sectors and providing support for achieving this; and enhancing the connectivity of the District through improved transport linkages to airports, strengthened communications (including the delivery of fibre optic) and prioritising the delivery of a Northern Powerhouse Rail station in Bradford City Centre. The policy would be expected to make a major positive contribution towards social and economic SA Objectives, primarily due to its impact in enhancing the competitiveness and success of the local economy and employment opportunities, which in turn would reduce deprivation and poverty, enhance the sustainability of communities, improve the social/recreational/cultural offering in the District, improve education and skills learning opportunities and reduce inequalities. There is a risk that the significant economic growth being sought could lead to negative impacts on SA Objectives related to the natural environment, such as an increase in operating businesses posing a risk to air quality.

- **Policy EC1 Reasonable Alternative 1 (EC1RA1):** The Council considered undertaking a less significant update to the policy. There is some uncertainty over what elements would be updated and what would remain the same. Not reviewing the policy could potentially make it less applicable to the current economic conditions and opportunities in Bradford. It could also potentially lead to problems in creating divergence between the growth strategy and the updated core strategy policy. It is expected that EC1RA1 would result in largely similar impacts to EC1 but with less probability and potentially of a slightly lower magnitude.

**Policy EC2: Employment Land, Jobs and Skills Requirements** is under review. The policy would establish the Council's commitment to delivering 1,600 jobs per annum to 2037 and a minimum of 60ha of new employment land (through the allocations DPD). Of the 60ha of new employment land, 40ha would be in the Regional City of Bradford, 15ha in Airedale and 5ha in Wharfedale. Priority sectors would include specialist environmental research and design sectors as well as logistics and distribution sectors. The Council would seek to strongly encourage development proposals to contribute to the creation of employment opportunities and to contribute to skills development. EC2 would be expected to make a major positive contribution towards social and economic SA Objectives, primarily due to the significant improvement to local employment opportunities that are accessible to all, of a high-quality and diverse range, applicable for the modern economy, and which also provide skills learning opportunities. The policy would be likely to contribute towards a reduction in deprivation, poverty and inequality whilst providing a boost to the health and education of local people as well as the cohesiveness of communities as well as the local offering of key services, amenities, culture/leisure/recreation places and activities. There is a risk that the significant scale of employment development being sought could lead to negative impacts on SA Objectives related to the natural environment, such as an increase in operating businesses posing a risk to air quality. EC2 has been updated to conform with the latest evidence base on the objectively identified employment needs and land availability in Bradford. The Council considered that any alternative to this (i.e. an alternative that does not conform with the best available evidence or does not seek to satisfy Bradford's needs whilst conforming with land availability), would not be reasonable.

**Policy EC3: Employment and Skills Delivery** is under review. The purpose of the policy is to set out how the employment development requirements identified in EC2 would be achieved. The Council's preferred option would be for a) Bradford City Centre to be the primary focus for development of new office and research & development floorspace; b) Regional City of Bradford and Airedale to be the primary focus for new general industrial as well as storage or distribution floorspace; various research and advanced manufacturing floorspaces at Esholt Business Park; the integration of employment opportunities within larger sites and urban extensions; implementing regenerative initiatives; and securing an agreed training or apprenticeship programme for development proposals that exceed certain thresholds. The preferred option for EC3 would be expected to make a major contribution towards ensuring that employment opportunities in Bradford are significantly enhanced whilst boosting the growth of the local economy. These jobs would predominantly be in locations that are highly accessible for local people including via sustainable modes of transport, thereby reducing employment inequalities whilst conforming with the transition towards low-carbon transport. It is unclear if the provision of new storage and distribution floorspace could lead to an increase in HGV movements in some locations.

- **Policy EC3 Reasonable Alternative 1 (EC3RA1):** The first reasonable alternative identified by the Council was to focus on a more narrow range of issues as opposed to a comprehensive overview. Whilst there is some uncertainty of what issues would be disregarded under this alternative, it is considered to be likely that EC3RA1 would lead to mostly similar impacts as EC3 but of a slightly lower magnitude and with less certainty. This alternative may make it difficult to achieve regeneration throughout Bradford and to modernise the local economy.
- **Policy EC3 Reasonable Alternative 2 (EC3RA2):** The second reasonable alternative identified by the Council was to combine policy EC3 with EC2 (i.e. to have on policy that identifies the employment requirement and also sets out how it will be achieved). This approach would be expected to lead to the same impacts as EC2 and EC3 on their own but, due to the very lengthy and complicated policy it would result in, could potentially reduce the probability of these impacts if the policy became more difficult to follow and implement.

**Policy EC4: Sustainable Economic Growth** is not under review. The proposed policy would set out the Council’s intention to manage economic and employment growth in a sustainable manner. This would involve assessing site proposals for their sustainability; monitoring employment land availability to ensure needs can be met; limiting alternative development of current employment land and buildings; identifying Strategic Employment Zones where the only permissible development would be employment based; supporting priority sectors through appropriately located sites; encouraging enterprises that develop or enhance tourism, culture and leisure as well as the built and natural environment; promoting development that diversifies and strengthens the rural economy; supporting the provision of live-work premises; and ensuring new development of 1000m2+ floorspace achieve ‘BREEAM Very Good’ and, by 2019, ‘BREEAM Excellent’ unless it is not feasible. EC4 would be expected to make a major contribution towards ensuring that employment needs in Bradford are met and that jobs are in highly accessible and appropriate locations. The proposed policy would be likely to ensure that new employment development is relatively sustainable and makes a positive contribution to the local natural and built environment.

**Policy EC5: City, Town, District and Local Centres** is under review. The Council’s preferred option for the policy is for decisions, plans, strategies and programmes to sustain and enhance the vitality and viability of a network and hierarchy of defined centres in Bradford. The policy sets out the various types of development that should be the focus of each city, town, district and local centre. The policy would be expected to help ensure that new employment development is appropriate for the surrounding area and is able to compete and succeed. Settlements in the district would be likely to benefit from an appropriate type and level of employment growth that helps to reduce deprivation, poverty and inequalities. The character and distinct sense of place for each centre would be likely to be protected and enhanced as a result. EC5 was updated to align with the latest evidence and national policy changes. The Council considered that any alternative to this (i.e. an alternative that does not conform with national policy or ignores the best available evidence) would not be reasonable.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		EC1	--	Leeds City region	P/I	LT	M	Each policy → support and encourage significant employment development and economic growth → increase in energy consumption + associated transport → increase in associated GHG emissions.
		EC1RA1	--	Bradford district	P/I	LT	L	
		EC2	-	Bradford district	P/I	LT	M	Each policy → new employment land in locations accessible via active and public transport → limited GHG emissions associated with increase in movement.
		EC3	-	Bradford district	P/I	LT	M	
		EC3RA1	-	Bradford district	P/I	LT	L	EC4 → new development of 1000m2+ floorspace achieving BREEAM excellent → relatively energy efficient development.  <b>Recommendations:</b> Best efforts should be made to ensure that all new employment land is highly accessible via walking and cycling.
		EC3RA2	-	Bradford district	P/I	LT	L	
		EC4	+	Bradford district	P/I	LT	M	
2. Waste		EC5	-	Bradford district	P/I	LT	M	
		EC1	--	Leeds City region	T/R	LT	M	Each policy → support and encourage significant employment development and economic growth → increase in associated waste due to materials used during construction + waste from increased business operations
		EC1RA1	--	Bradford district	T/R	LT	L	
		EC2	-	Bradford district	T/R	LT	M	Each policy → directs new employment development towards locations with lots of opportunities for reusing

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		EC3	-	Bradford district	T/R	LT	M	buildings → reduced waste associated with construction in some circumstances. EC4 → new development of 1000m2+ floorspace achieving BREEAM excellent → sustainable waste management  <b>Recommendations:</b> EC policies could seek to encourage circular economy principles in new development that minimises the consumption of materials and enhances reuse and recycle principles.
		EC3RA1	-	Bradford district	T/R	LT	L	
		EC3RA2	-	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	M	
		EC5	-	Bradford district	T/R	LT	M	
3. Land & buildings		EC1	-	Leeds City region	T/R	LT	M	Each policy → support and encourage significant employment development and economic growth → loss of greenfield land to employment development in some circumstances. Each policy → directs new employment development towards locations with lots of opportunities for using PDL → reduced greenfield land lost to development.  <b>Recommendations:</b> When assessing the sustainability of proposals, the Council should consider impacts on land and soil resource. Proposals could be required to adopt best practice measures for soil management during construction and for excavated soil and rock to be reused either as part of the development or elsewhere.
		EC1RA1	-	Bradford district	T/R	LT	L	
		EC2	-	Bradford district	T/R	LT	M	
		EC3	-	Bradford district	T/R	LT	M	
		EC3RA1	-	Bradford district	T/R	LT	L	
		EC3RA2	-	Bradford district	T/R	LT	L	
		EC4	-	Bradford district	T/R	LT	M	
4. Climate change resilience		EC1	?	Leeds City region	T/R	LT	M	Each policy → support and encourage significant quantity of new employment and economic development → precise location of this development is uncertain → impacts on this SA Objective are uncertain as impacts depend on precise location and type of development in related to local flood risk. EC4 → Council to assess sustainability performance of employment site proposals → likely to factor in impacts on climate change resilience including flood risk.  <b>Recommendations:</b> None.
		EC1RA1	?	Bradford district	T/R	LT	L	
		EC2	?	Bradford district	T/R	LT	M	
		EC3	?	Bradford district	T/R	LT	M	
		EC3RA1	?	Bradford district	T/R	LT	L	
		EC3RA2	?	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	M	
5. Water resources		EC1	-	Leeds City region	T/R	LT	L	Each policy → support and encourage significant quantity of new employment and economic development → increase in water consumption due to business operations. EC4 → Very Good and Excellent BREEAM standards → relatively water efficient developments likely. Each policy → significant new development → potential for impacts on quality of natural waterbodies during construction and operation of businesses → largely dependent on location and type of development which is currently unknown → impacts on water quality are uncertain. EC4 → Council to factor in sustainability of proposals prior to permission → likely to help protect waterbodies. <b>Recommendations:</b> EC policies could seek to require proposals to show there is adequate water resource availability for their operations with close consideration given to water use efficiency standards.
		EC1RA1	-	Bradford district	T/R	LT	L	
		EC2	-	Bradford district	T/R	LT	L	
		EC3	-	Bradford district	T/R	LT	L	
		EC3RA1	-	Bradford district	T/R	LT	L	
		EC3RA2	-	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	L	
6. Biodiversity & geodiversity		EC1	-	Leeds City region	T/R	LT	M	Each policy → support and encourage significant quantity of new employment and economic development → potential loss of greenfield land and supporting habitats + reduced ecological connectivity. Each policy → majority of new employment and economic development likely to be directed towards existing settlements and urban areas which will help to limit loss of greenfield land or reduced ecological connectivity. EC4 → Council to appraise sustainability performance of sites + policy sets out BREEAM requirements + policy requires protection & enhancement of natural and built environment → employment sites more likely to protect and
		EC1RA1	-	Bradford district	T/R	LT	L	
		EC2	-	Bradford district	T/R	LT	M	
		EC3	-	Bradford district	T/R	LT	M	
		EC3RA1	-	Bradford district	T/R	LT	L	
		EC3RA2	-	Bradford district	T/R	LT	L	

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		EC4	+	Bradford district	T/R	LT	M	potentially enhance biodiversity value and ecological connectivity, particularly at brownfield sites.
		EC5	-	Bradford district	T/R	LT	M	<b>Recommendations: None.</b>
7. Landscape & townscape		EC1	-	Leeds City region	T/R	LT	M	Each policy → support and encourage significant quantity of new employment and economic development → potential loss of greenfield land and open space → potential impacts on local landscape & townscape character + potential impacts on setting of heritage assets & historic areas.
		EC1RA1	-	Bradford district	T/R	LT	L	
		EC2	-	Bradford district	T/R	LT	M	Each policy → focuses significant majority of new economic and employment development in existing settlements and built up areas → most negative impacts on natural landscapes likely avoided.
		EC3	-	Bradford district	T/R	LT	M	
		EC3RA1	-	Bradford district	T/R	LT	L	
		EC3RA2	-	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	M	Each policy → focusses majority of new economy and employment development in existing employment areas → development more likely to be in-keeping with the surrounding townscape → most negative potential impacts on townscape character likely avoided.
		EC5	-	Bradford district	T/R	LT	M	
8. Cultural heritage		EC1	-	Leeds City region	T/R	LT	M	EC4 → requirement for proposals to improve the natural and built environment → likely to help avoid and mitigate potential negative impacts of development on landscapes and townscapes as well as the setting of heritage assets and historic areas.
		EC1RA1	-	Bradford district	T/R	LT	L	
		EC2	-	Bradford district	T/R	LT	M	
		EC3	-	Bradford district	T/R	LT	M	<b>Recommendations: EC policies could seek to ensure that new employment development is of a high-quality design.</b>
		EC3RA1	-	Bradford district	T/R	LT	L	
		EC3RA2	-	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	M	
	EC5	-	Bradford district	T/R	LT	M		
9. Air quality		EC1	-	Leeds City region	T/R	LT	M	Each policy → support and encourage significant quantity of new employment and economic development → likely increase in movements associated with the operation of businesses and people commuting to work in Bradford.
		EC1RA1	-	Bradford district	T/R	LT	L	
		EC2	-	Bradford district	T/R	LT	M	Each policy → focusses new development in locations that are generally highly accessible via active and public transport → help to limit car movements associated with employment + help to limit air pollution from this.
		EC3	-	Bradford district	T/R	LT	M	
		EC3RA1	-	Bradford district	T/R	LT	L	EC1 → improvements to communications network & fibre optic → reduced travel need for local people and businesses → help to limit the increase in traffic movements caused by economic & employment growth.
		EC3RA2	-	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	M	
	EC5	-	Bradford district	T/R	LT	M	EC2 → significant growth in storage and distribution → potential increase in HGV movements associated with transport of goods → potential increase in air pollution associated with this.	
10. Transport		EC1	+/-	Leeds City region	T/R	LT	M	EC4 → requires Very Good and Excellent BREEAM standards → likely to help limit air pollution associated with new employment development.
		EC1RA1	+/-	Bradford district	T/R	LT	L	
		EC2	+/-	Bradford district	T/R	LT	M	<b>Recommendations: Best efforts should be made to ensure that all new employment land is highly accessible via walking, cycling and public transport.</b>
		EC3	+/-	Bradford district	T/R	LT	M	
		EC3RA1	+/-	Bradford district	T/R	LT	L	
		EC3RA2	+/-	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	M	
		EC5	+/-	Bradford district	T/R	LT	M	
	EC1	+	Leeds City region	T/R	LT	L		

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
11. Housing		EC1RA1	+	Bradford district	T/R	LT	L	Each policy → significant economic and employment growth → could make the construction of new homes in Bradford more viable in various locations.  <b>Recommendations: None.</b>
		EC2	+	Bradford district	T/R	LT	L	
		EC3	+	Bradford district	T/R	LT	L	
		EC3RA1	+	Bradford district	T/R	LT	L	
		EC3RA2	+	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	L	
		EC5	+	Bradford district	T/R	LT	L	
12. Range of accessible services		EC1	+	Leeds City region	T/R	LT	M	EC1, EC2, EC2RA2 & EC3 → new and improved services and employment areas in accessible locations in Bradford. EC1RA1 + EC3RA1 → similar impact but of a lower magnitude. EC4 → support enterprise that develops or enhances tourism, culture and leisure facilities. EC5 → sustain and enhance the vitality and viability of city, town and district centres → provision of retail, leisure, entertainment, arts, culture, tourism, sports and recreation spaces → facilitate social mixing and community cohesion. All policies → significant economy and employment growth → reduction in poverty, deprivation & inequality. All policies → new economic and employment development focussed in existing employment areas of the District → amenity of residential areas and neighbourhoods protected from potential harm.
		EC1RA1	+	Bradford district	T/R	LT	L	
		EC2	+	Bradford district	T/R	LT	M	
		EC3	+	Bradford district	T/R	LT	M	
		EC3RA1	+	Bradford district	T/R	LT	L	
		EC3RA2	+	Bradford district	T/R	LT	L	
		EC4	++	Bradford district	T/R	LT	M	
EC5	++	Bradford district	T/R	LT	M			
13. Social Cohesion		EC1	+	Leeds City region	T/R	LT	M	<b>Recommendations: None.</b>
		EC1RA1	+	Bradford district	T/R	LT	L	
		EC2	+	Bradford district	T/R	LT	M	
		EC3	+	Bradford district	T/R	LT	M	
		EC3RA1	+	Bradford district	T/R	LT	L	
		EC3RA2	+	Bradford district	T/R	LT	L	
		EC4	++	Bradford district	T/R	LT	M	
EC5	++	Bradford district	T/R	LT	M			
14. Culture & leisure		EC1	+	Leeds City region	T/R	LT	M	
		EC1RA1	+	Bradford district	T/R	LT	L	
		EC2	+	Bradford district	T/R	LT	M	
		EC3	+	Bradford district	T/R	LT	M	
		EC3RA1	+	Bradford district	T/R	LT	L	
		EC3RA2	+	Bradford district	T/R	LT	L	
		EC4	++	Bradford district	T/R	LT	M	
EC5	++	Bradford district	T/R	LT	M			
15. Safe & secure		EC1	0	Leeds City region	T/R	LT	M	All policies → no discernible impacts.  <b>Recommendations: None.</b>
		EC1RA1	0	Bradford district	T/R	LT	L	
		EC2	0	Bradford district	T/R	LT	M	
		EC3	0	Bradford district	T/R	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		EC3RA1	0	Bradford district	T/R	LT	L	
		EC3RA2	0	Bradford district	T/R	LT	L	
		EC4	0	Bradford district	T/R	LT	M	
		EC5	0	Bradford district	T/R	LT	M	
16. Health		EC1	++	Leeds City region	T/R	LT	M	All policies → significant improvement to range and quantity of employment opportunities → reduced deprivation, poverty and inequality + boost to mental wellbeing of local people due to improved employment offering. EC1 likely to have a positive impact of greater magnitude than its alternative.  <b>Recommendations: None.</b>
		EC1RA1	+	Bradford district	T/R	LT	L	
		EC2	+	Bradford district	T/R	LT	M	
		EC3	+	Bradford district	T/R	LT	M	
		EC3RA1	+	Bradford district	T/R	LT	L	
		EC3RA2	+	Bradford district	T/R	LT	L	
		EC4	+	Bradford district	T/R	LT	M	
17. Education		EC1	+	Leeds City region	T/R	LT	H	Each policy → significant improvement in employment offering for local people → increase in quality and quantity of opportunities for learning new skills applicable to modern jobs.  EC3 & EC3RA2 → major boost to local opportunities for education & skills learning, such as through apprenticeships + boost to local higher education facilities.  <b>Recommendations: None.</b>
		EC1RA1	+	Bradford district	T/R	LT	M	
		EC2	+	Bradford district	T/R	LT	H	
		EC3	++	Bradford district	T/R	LT	H	
		EC3RA1	+	Bradford district	T/R	LT	M	
		EC3RA2	++	Bradford district	T/R	LT	M	
		EC4	+	Bradford district	T/R	LT	H	
18. Employment		EC1	++	Leeds City region	T/R	LT	H	EC1 → contribution towards a more successful & competitive economy in Bradford + increased focus on enterprise + enhancing skills learning → improved employment offering + increased employable skills amongst local people. EC1RA1 → similar impact but likely slightly lower magnitude with less certainty.  EC2 & EC3 → jobs created in Bradford likely to satisfy local requirements. EC3RA1 → similar to impacts of EC3 but likely slightly lower magnitude with less certainty.  EC4 → more sustainable economy → new jobs in Bradford more likely to be long-term & secure & appropriate for current and future markets.  EC5 → new economic development in accordance with settlement hierarchy → creation of new employment opportunities of an appropriate type in all settlements including smaller & more rural → improved accessibility to jobs for people throughout Bradford.
		EC1RA1	++	Bradford district	T/R	LT	M	
		EC2	++	Bradford district	T/R	LT	H	
		EC3	++	Bradford district	T/R	LT	H	
		EC3RA1	++	Bradford district	T/R	LT	M	
		EC3RA2	++	Bradford district	T/R	LT	M	
		EC4	++	Bradford district	T/R	LT	H	
19. Economy		EC1	++	Leeds City region	T/R	LT	H	All policies → likely to contribute to significant & regenerative economic growth in Bradford with an increasing focus on research, design, logistics, storage & distribution as well as enterprise & new start-ups → likely increase in local employment rate, average earnings, number of new start-ups, number of visitors to the District & level of local spend.  <b>Recommendations: None.</b>
		EC1RA1	++	Bradford district	T/R	LT	M	
		EC2	++	Bradford district	T/R	LT	H	
		EC3	++	Bradford district	T/R	LT	H	
		EC3RA1	++	Bradford district	T/R	LT	M	
		EC3RA2	++	Bradford district	T/R	LT	M	
EC4	++	Bradford district	T/R	LT	H			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		EC5	++	Bradford district	T/R	LT	H	

Summary of, and assumptions in the assessment of, all **Planning for Prosperity: Transport**

**Policy TR1: Travel Reduction and Modal Shift** is not under review. The policy would seek to reduce the need to travel, encourage the use of sustainable travel modes, limit traffic growth, reduce travel time, reduce congestion and improve journey time reliability. This would primarily be achieved by managing the location of new development; effectively managing Bradford's existing transport network; requiring transport plans from some change of use developments; managing travel demand through parking policies; developing new facilities for active travel modes; implementing infrastructure for alternative fuel technologies and cars (e.g. electric cars); and reducing the need to travel (e.g. promoting home working). The policy would be highly likely to contribute towards a reduction in congestion and pollution in Bradford and the transition towards a lower-emission and more sustainable transport system. A more integrated transport network that encourages active travel would also be highly likely to benefit the physical and mental health and wellbeing of local people and to facilitate safer and more cohesive communities.

- **TR1 Reasonable Alternative 1 (TR1RA1):** Less extensive changes and more compact policy. May not provide a comprehensive overview of issues. This alternative could therefore lead to similar impacts as the preferred option, but likely of a lower magnitude and with less probability.

**Policy TR2: Parking Policy** is under review. The Council's preferred approach would seek to manage car parking to better control travel demand, protect local character, encourage the uptake of sustainable travel modes and cater for the needs of disabled people and other groups of society. This would primarily be achieved by reducing the long stay parking offering in town centres; using on-street parking controls in town centres; providing rail- and bus-based park and ride facilities; charges; improving the convenience, safety and security of parking in city and town centres; and design standards for new development. TR2 would be likely to encourage local people to travel into town and city centres via walking, cycling or public transport and this would be likely to lead to a reduction in congestion and pollution. Higher rates of walking and cycling would also be beneficial to the mental and physical wellbeing of local people whilst also increasing footfall in central areas. The requirement for new parking facilities to be well integrated into the design of proposals would help to establish safe and pleasant pedestrian environments.

- **TR2 Reasonable Alternative 1 (TR2RA1):** Less extensive changes and more compact policy. Existing TR2 policy no longer aligns with latest corporate transport strategy to increase levels of active travel by integrating cycle parking and facilities in new development and encouraging the use of electric vehicles through the integration of charging points in developments. This alternative could therefore lead to similar impacts as the preferred option, but likely of a lower magnitude and with less probability.

**Policy TR3: Integrating Sustainable Transport & Development** is under review. The Council's preferred approach would seek to safeguard and improve public transport, walking and cycling infrastructure. It would achieve this by enforcing accessibility standards at new developments; encouraging proposals to support enhancements to public transport infrastructure where viable; new public transport provision (e.g. in line with LTP 3); supporting opportunities for improving the rail network; protecting sites for rail, bus, walking and cycling routes and requiring proposals to encourage walking and cycling through careful layout and to create attractive places with a permeable network of walking and cycling routes. The policy would be highly likely to contribute to a more integrated transport network in Bradford and to help reduce congestion and pollution, both of which would contribute towards the District's transition towards a lower-emission and more sustainable transport system. Higher rates of active travel would also benefit the physical and mental well-being of local people. Therefore, TR3 is also highly likely to benefit the health and wellbeing of local people. It would also increase footfall in central areas whilst establishing attractive street scenes.

- **TR3 Reasonable Alternative 1 (TR3RA1):** Less extensive changes and more compact policy. Existing TR3 policy no longer aligns with latest corporate transport strategy as it does not take account of the use of electric vehicles as a sustainable mode of transport or a more integrated approach to sustainable travel. This alternative could therefore lead to similar impacts as the preferred option, but likely of a lower magnitude and with less probability.

**Policy TR4: Transport and Tourism** is not under review. The policy would seek to ensure sustainable access to tourist destinations, heritage and cultural assets and leisure uses. The policy also supports the development of 'transport-based' leisure attractions such as heritage railways, cycle paths and walking trails. New attractions would be

required to be located in accordance with accessibility standards. The policy would be likely to contribute towards a more integrated transport network in Bradford and to help reduce congestion and pollution by better enable tourists and visitors to opt for more efficient and sustainable transport modes. TR4 would also help to enhance the recreational, cultural and leisure offering in the District and this would be likely to benefit local people and the local economy.

**Policy TR5: Strategic Transport Delivery** is under review. The Council’s preferred approach would seek to improve transport connectivity in the District especially in isolated areas in order to prevent social and economic exclusion. The policy encourages the use of technology and sustainable transport in order to service the more remote areas of the district. The policy is highly likely to contribute to the development of an integrated transport network and reduce congestion and pollution, both of which would contribute towards the District’s transition towards a lower-emission and more sustainable transport system. The policy also ensures that transport is accessible for all, including those that are disabled or have mobility impairment which would help to ensure all people can access facilities, services, amenities. No reasonable alternatives are available.

**Policy TR6: Freight** is under review. The Council’s preferred approach would encourage the development of a freight distribution system that makes the most efficient and effective use of all modes of transport, subject to environmental considerations. TR6 would seek to maximise the use of rail freight and protect rail connected land for future use. Achieving this would be likely to contribute to the transition towards a more integrated transport system in Bradford with reduced congestion and pollution, particularly due to the commitment to ‘support measures to reduce the adverse impact of freight movements on air quality’. At the same time, TR6 would ‘encourage capacity enhancements’ and ‘encourage the development of sites for new secure HGV parking facilities’, and this would be likely to result in a net increase in HGV movements in Bradford as well as any congestion or pollution associated with this. TR6 would seek to improve security at HGV park facilities and would thus contribute towards improving safety and security for people and property. The policy would also be likely to improve employment and investment opportunities in the freight industry in Bradford.

- **TR6 Reasonable Alternative 1 (TR6RA1):** Less extensive changes and more compact policy. Existing TR6 policy no longer aligns with latest corporate transport strategy. The need to address inappropriate HGV parking within residential areas is considered a corporate priority, as are junction improvements to allow safe access to HGVs and LGVs to key employment areas and sites.

**Policy TR7: Transport Investment and Management Priorities** is not under review. The policy would seek to prioritise transport strategies that support the regeneration or use of sustainable modes of transport in both new and existing transport infrastructure. The policy would be highly likely to contribute to the development of a more integrated transport network and support the District’s transition towards a lower-emission and more sustainable transport system. The policy’s focus on enhancing and maintaining existing transport infrastructure would be an efficient use of Bradford’s resources.

**Policy TR8: Aircraft Safety** is not under review. The policy would prevent development that creates a hazard to the safe operation of aircraft, aerodromes or aircraft navigation facilities, thereby facilitating continued safe operation of the airport. It is unclear if this would lead to an increase in flight operations at the airport, but the impact of airport and flight operations on local GHG emissions and air quality would be likely to continue.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		TR1	++	Bradford District	T/R	LT	H	TR1, TR1RA1, TR2, TR3, TR4, TR5 and TR7 → enhanced public and sustainable transport routes → reduced GHGs. TR1 → reduced travel need + reduced travel times → reduced GHG emissions from transport. TR1 likely to have impacts of a greater magnitude than TR1RA1 with greater certainty than TR1.
		TR1RA1	+	Bradford District	T/R	LT	M	
		TR2	+	Bradford District	T/R	LT	M	
		TR2RA1	+	Bradford District	T/I	LT	L	
		TR3	++	Bradford District	T/R	LT	M	TR6 → increased freight activity → increase GHG emissions → mitigated to some extent by more efficient and

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		TR3RA1	+	Bradford District	T/I	LT	L	sustainable freight options as well as air quality protection measures.  TR8 → safeguards the operation of the airport → continued GHG emissions associated with air travel.  TR2RA1, TR3RA1, TR5RA1 & TR6RA1 → similar impacts to preferred options but likely of lower magnitude with less probability.  <b>Recommendations: None.</b>
		TR4	+	Bradford District	T/R	LT	M	
		TR5	+	Bradford District	T/R	LT	M	
		TR5RA1	+	Bradford District	T/I	LT	L	
		TR6	-	Bradford District	T/I	LT	L	
		TR6RA1	-	Bradford District	T/I	LT	L	
		TR7	++	Bradford District	T/R	LT	M	
		TR8	-	Bradford District	T/I	LT	L	
2. Waste		TR1	○	n/a	n/a	n/a	H	TR1, TR1RA1, TR2, TR3, TR4, TR5, TR6, TR8 and their alternatives → no discernible impact.  TR7 → prioritises the enhancement of existing infrastructure before developing new infrastructure → makes efficient use of resources → reduces waste.  <b>Recommendations: None.</b>
		TR1RA1	○	n/a	n/a	n/a	H	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	○	n/a	n/a	n/a	H	
		TR3RA1	○	n/a	n/a	n/a	H	
		TR4	○	n/a	n/a	n/a	H	
		TR5	○	n/a	n/a	n/a	H	
		TR5RA1	○	n/a	n/a	n/a	H	
		TR6	○	n/a	n/a	n/a	H	
		TR6RA1	○	n/a	n/a	n/a	H	
TR7	+	Bradford District	T/R	LT	M			
TR8	○	n/a	n/a	n/a	H			
3. Land & buildings		TR1	○	n/a	n/a	n/a	H	TR1, TR1RA1, TR2, TR3, TR4, TR5, TR6, TR8 and their alternatives → no discernible impacts  TR7 → prioritise the enhancement of existing infrastructure before developing new infrastructure → efficient use of existing buildings and infrastructure.  <b>Recommendations: None.</b>
		TR1RA1	○	n/a	n/a	n/a	H	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	○	n/a	n/a	n/a	H	
		TR3RA1	○	n/a	n/a	n/a	H	
		TR4	○	n/a	n/a	n/a	H	
		TR5	○	n/a	n/a	n/a	H	
		TR5RA1	○	n/a	n/a	n/a	H	
		TR6	○	n/a	n/a	n/a	H	
		TR6RA1	○	n/a	n/a	n/a	H	
		TR7	+	Bradford District	T/R	LT	M	
TR8	○	n/a	n/a	n/a	H			
		TR1	○	n/a	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
4. Climate change vulnerability		TR1RA1	○	n/a	n/a	n/a	H	No discernible impacts from any of the Transport policies or their alternatives.  <b>Recommendations: None.</b>
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	○	n/a	n/a	n/a	H	
		TR3RA1	○	n/a	n/a	n/a	H	
		TR4	○	n/a	n/a	n/a	H	
		TR5	○	n/a	n/a	n/a	H	
		TR5RA1	○	n/a	n/a	n/a	H	
		TR6	○	n/a	n/a	n/a	H	
		TR6RA1	○	n/a	n/a	n/a	H	
		TR7	○	n/a	n/a	n/a	H	
TR8	○	n/a	n/a	n/a	H			
5. Water resources		TR1	○	n/a	n/a	n/a	H	No discernible impacts from any of the Transport policies or their alternatives.  <b>Recommendations: None.</b>
		TR1RA1	○	n/a	n/a	n/a	H	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	○	n/a	n/a	n/a	H	
		TR3RA1	○	n/a	n/a	n/a	H	
		TR4	○	n/a	n/a	n/a	H	
		TR5	○	n/a	n/a	n/a	H	
		TR5RA1	○	n/a	n/a	n/a	H	
		TR6	○	n/a	n/a	n/a	H	
		TR6RA1	○	n/a	n/a	n/a	H	
TR7	○	n/a	n/a	n/a	H			
TR8	○	n/a	n/a	n/a	H			
6. Biodiversity & geodiversity		TR1	○	n/a	n/a	n/a	H	TR1, TR1RA1, TR2, TR3, TR5, TR7, TR8 & their alternatives → no discernible impact.  TR6 & TR6RA1 → increased freight activity → increased atmospheric nitrogen deposition → potential impacts on nitrogen sensitive habitats.  TR6 & TR6RA1 → new freight infrastructure → potential loss of greenfield or disruption to ecological connectivity → mitigated to some extent by TR6 requirement to protect & enhance important biodiversity sites.  TR4 → increased visitor numbers at biodiversity sites e.g. South Pennine Moors → ecotourism opportunities & investment for protection/enhancement of sites (positive) vs. increase in disturbances of habitats (negative).
		TR1RA1	○	n/a	n/a	n/a	H	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	○	n/a	n/a	n/a	H	
		TR3RA1	○	n/a	n/a	n/a	H	
		TR4	-	Bradford District	P/I	LT	L	
		TR5	○	n/a	n/a	n/a	H	
TR5RA1	○	n/a	n/a	n/a	H			
TR6	-	Bradford District	P/I	LT	L			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		TR6RA1	-	Bradford District	P/I	LT	L	<b>Recommendations: None.</b>
		TR7	O	n/a	n/a	n/a	H	
		TR8	O	n/a	n/a	n/a	H	
7. Landscape & townscape		TR1	+	Bradford District	T/R	LT	M	TR1, TR1RA1, TR3, TR4, TR5 and TR7 → reduce congestion → reduced impacts on townscape character. Impacts of TR1 likely to be of a greater magnitude than TR1 with greater certainty than TR1. TR2 → design led approach to integrating parking developments → improve townscape. TR3 → maximises placemaking opportunities of transport hubs and interchanges + seeks to create attractive places → enhance local townscape. TR4, TR5 and TR6 → potential for new transport infrastructure in rural areas → risk of negative impact on local landscape and townscape character. TR2RA1, TR3RA1, TR5RA1 & TR6RA1 → similar impacts to preferred options but likely of lower magnitude with less probability. <b>Recommendations: None.</b>
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	+	Bradford District	T/R	LT	M	
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	+	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	-	Bradford District	P/I	LT	M	
		TR5	-	Bradford District	P/I	LT	M	
		TR5RA1	-	Bradford District	P/I	LT	L	
		TR6	-	Bradford District	P/I	LT	M	
		TR6RA1	-	Bradford District	P/I	LT	L	
	TR7	+	Bradford District	T/R	LT	M		
	TR8	O	n/a	n/a	n/a	H		
8. Cultural heritage		TR1	+	Bradford District	T/R	LT	M	TR1, TR1RA1, TR3, TR4, TR5 and TR7 → enhanced sustainable transport options → reduced congestion → enhanced setting of Conservation Areas. Impacts of TR1 likely to be of a greater magnitude with greater certainty than TR1. TR2 → design led approach to parking developments → improved street scene → enhanced setting of heritage assets. TR2RA1, TR3RA1 & TR5RA1 → similar impacts to preferred options but likely of lower magnitude with less probability. TR4 → improved accessibility of visitor attractions including heritage assets + development and maintenance of attractions, such as heritage railways → protected and enhanced heritage assets and local people more able to access and appreciate them. <b>Recommendations: None.</b>
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	+	Bradford District	T/R	LT	M	
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	+	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	++	Bradford District	T/R	LT	M	
		TR5	+	Bradford District	T/R	LT	M	
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	O	n/a	n/a	n/a	H	
		TR6RA1	O	n/a	n/a	n/a	H	
	TR7	+	Bradford District	T/R	LT	M		
	TR8	O	n/a	n/a	n/a	H		
9. Air quality		TR1	++	Bradford District	T/R	LT	H	TR1, TR1RA1, TR2, TR3, TR4, TR5 and TR7 → enhanced sustainable transport routes → reduced vehicular pollution. Impacts of TR1 likely to be of a greater magnitude with greater certainty than TR1. TR1 & TR1RA1 → reduced travel need + reduced travel times → reduced pollution from transport. TR6 → increased freight activity → increased vehicular pollution → mitigated to some extent by more efficient and sustainable freight options as well as air quality protection measures.
		TR1RA1	++	Bradford District	T/R	LT	L	
		TR2	+	Bradford District	T/R	LT	M	
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	++	Bradford District	T/R	LT	M	
	TR3RA1	+	Bradford District	T/R	LT	L		

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		TR4	+	Bradford District	T/R	LT	M	<p>TR8 → safeguards the operation of the airport → continued air pollution associated with airport &amp; flights.</p> <p>TR2RA1, TR3RA1, TR5RA1 &amp; TR6RA1 → similar impacts to preferred options but likely of lower magnitude with less probability.</p> <p><b>Recommendations: None.</b></p>
		TR5	+	Bradford District	T/R	LT	M	
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	-	Bradford District	T/I	LT	L	
		TR6RA1	-	Bradford District	T/I	LT	L	
		TR7	++	Bradford District	T/R	LT	M	
		TR8	○	n/a	n/a	n/a	n/a	
10. Transport		TR1	++	Bradford District	T/R	LT	H	<p>Each Transport policy → integrated and more efficient and sustainable transport network.</p> <p>TR1, TR3, TR4, TR5 &amp; TR7 → encourage sustainable and/or active transport + less, shorter and increasingly efficient movements → lower-emission transport system. Impacts of TR1 likely to be of a greater magnitude with greater certainty than TR1.</p> <p>TR6 → ensures the most efficient modes for freight transport are used → encourages rail freight → reduces congestion and demand of HGV.</p> <p>TR2RA1, TR3RA1, TR5RA1 &amp; TR6RA1 → similar impacts to preferred options but likely of lower magnitude with less probability.</p> <p><b>Recommendations: None.</b></p>
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	+	Bradford District	T/R	LT	L	
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	++	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	++	Bradford District	T/R	LT	M	
		TR5	++	Bradford District	T/R	LT	M	
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	+	Bradford District	T/R	LT	M	
		TR6RA1	+	Bradford District	T/R	LT	L	
TR7	++	Bradford District	T/R	LT	M			
TR8	+	Bradford District	T/R	LT	M			
11. Housing		TR1	○	n/a	n/a	n/a	H	<p>No discernible impacts from any of the Transport policies or their alternatives.</p> <p><b>Recommendations: None.</b></p>
		TR1RA1	○	n/a	n/a	n/a	H	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	○	n/a	n/a	n/a	H	
		TR3RA1	○	n/a	n/a	n/a	H	
		TR4	○	n/a	n/a	n/a	H	
		TR5	○	n/a	n/a	n/a	H	
		TR5RA1	○	n/a	n/a	n/a	H	
		TR6	○	n/a	n/a	n/a	H	
		TR6RA1	○	n/a	n/a	n/a	H	
TR7	○	n/a	n/a	n/a	H			
TR8	○	n/a	n/a	n/a	H			
		TR1	++	Bradford District	T/R	LT	M	<p>TR1, TR1RA1, TR2, TR3, TR4, TR5 and TR7 → more efficient and integrated transport system → enhanced accessibility of services as well as leisure &amp; cultural areas. Impacts of TR1 likely to be of a greater magnitude with</p>
		TR1RA1	++	Bradford District	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
12. Range of accessible services		TR2	+	Bradford District	T/R	LT	M	greater certainty than TR1.  TR1, TR3 and TR5 → enhanced walking and cycling options → facilitates social interactions + more permeable neighbourhoods + reduced risk of isolation.  TR4 → sustainable access to + creation of tourist destinations and leisure spaces → enhanced access to leisure & culture areas.  TR6, TR6RA1 & TR8 → no discernible impacts on SA Objectives 12, 13 or 14.
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	++	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	++	Bradford District	T/R	LT	M	
		TR5	++	Bradford District	T/R	LT	M	
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	○	n/a	n/a	n/a	H	
		TR6RA1	○	n/a	n/a	n/a	H	
		TR7	+	Bradford District	T/R	LT	M	
TR8	○	n/a	n/a	n/a	H			
13. Social Cohesion		TR1	++	Bradford District	T/R	LT	M	TR2RA1, TR3RA1, TR5RA1 → similar impacts to preferred options but likely of lower magnitude with less probability.  <b>Recommendations: None.</b>
		TR1RA1	++	Bradford District	T/R	LT	L	
		TR2	+	Bradford District	T/R	LT	M	
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	++	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	++	Bradford District	T/R	LT	M	
		TR5	++	Bradford District	T/R	LT	M	
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	○	n/a	n/a	n/a	H	
TR6RA1	○	n/a	n/a	n/a	H			
14. Culture & leisure		TR1	++	Bradford District	T/R	LT	M	
		TR1RA1	++	Bradford District	T/R	LT	L	
		TR2	+	Bradford District	T/R	LT	M	
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	++	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	++	Bradford District	T/R	LT	M	
		TR5	++	Bradford District	T/R	LT	M	
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	○	n/a	n/a	n/a	H	
TR6RA1	○	n/a	n/a	n/a	H			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
15. Safe & secure		TR7	+	Bradford District	T/R	LT	M	<p>TR1 &amp; TR1RA1 → high-quality design → safe infrastructure for travelling. Impacts of TR1 likely to be of a greater magnitude with greater certainty than TR1.</p> <p>TR2 and TR6 → parking development specifically designed to ensure safety and security for people and property.</p> <p>TR2RA1, TR3RA1 &amp; TR6RA1 → similar impacts to preferred options but likely of lower magnitude with less probability.</p> <p>TR3 and TR4 → enhanced walking and cycling options → designated areas improves safety for walkers and cyclists.</p> <p>TR8 → prevents development that would cause a hazard to aircraft → ensures safe operation of aircraft.</p> <p>TR5, TR5RA1 and TR7 → no discernible impacts.</p> <p><b>Recommendations: None.</b></p>
		TR8	○	n/a	n/a	n/a	H	
		TR1	+	Bradford District	T/R	LT	M	
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	++	Bradford District	T/R	LT	M	
		TR2RA1	+	Bradford District	T/R	LT	L	
		TR3	+	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	+	Bradford District	T/R	LT	M	
		TR5	○	n/a	n/a	n/a	H	
		TR5RA1	○	n/a	n/a	n/a	H	
		TR6	++	Bradford District	T/R	LT	M	
16. Health		TR1	+	Bradford District	T/R	LT	M	<p>TR1, TR1RA1, TR3, TR4 → enhanced active travel options + rates → benefits to mental and physical wellbeing.</p> <p>Impacts of TR1 likely to be of a greater magnitude with greater certainty than TR1.</p> <p>TR2, TR5, TR7, TR8 and their alternatives → no discernible impacts.</p> <p>TR6 → increased freight activity → increased particulate matter pollution → adverse impacts on human health, mitigated to some extent by focus on sustainable options and inclusion of air quality protection measures.</p> <p>TR6RA1 → similar impacts but potentially of slightly lower magnitude and with less certainty.</p> <p><b>Recommendations: None.</b></p>
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	+	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	+	Bradford District	T/R	LT	M	
		TR5	○	n/a	n/a	n/a	H	
		TR5RA1	○	n/a	n/a	n/a	H	
		TR6	-	n/a	n/a	n/a	H	
		TR6RA1	-	n/a	n/a	n/a	L	
		TR7	○	n/a	n/a	n/a	H	
17. Education		TR1	+	Bradford District	T/R	LT	M	<p>TR1, TR1RA1, TR3 &amp; TR3RA1 → enhanced walking, cycling and public transport options → more sustainable access to education facilities. Impacts of TR1 &amp; TR3 likely to be of a greater magnitude with greater certainty than TR1RA1 and TR3RA1.</p> <p>TR5 → improve transport connectivity to/from isolated areas → improved access to education facilities. TR5RA1 → similar impacts but likely slightly lower magnitude and with lower probability.</p>
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	
		TR3	+	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
	TR4	○	n/a	n/a	n/a	H		

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		TR5	+	Bradford District	T/R	LT	M	<b>Recommendations: None.</b>
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	○	n/a	n/a	n/a	n/a	
		TR6RA1	○	n/a	n/a	n/a	n/a	
		TR7	○	n/a	n/a	n/a	n/a	
		TR8	○	n/a	n/a	n/a	n/a	
18. Employment		TR1	+	Bradford District	T/R	LT	M	TR1, TR1RA1, TR3, TR4 & TR5 → enhanced walking, cycling and public transport options → more sustainable access to employment facilities for all people. Impacts of TR1 likely to be of a greater magnitude with greater certainty than TR1.
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	TR1, TR1RA1, TR3, TR4, TR5 & TR7 → more efficient and sustainable access into town and city centres → increased footfall and enhanced viability of central areas. Impacts of TR1 likely to be of a greater magnitude with greater certainty than TR1.
		TR3	+	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	++	Bradford District	T/R	LT	M	
		TR5	+	Bradford District	T/R	LT	M	TR2 → replacement of long-stay parking with short-stay and enhance park & ride facilities → more permeable town and city centres → increased footfall and more viable centres.
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	++	Bradford District	T/R	LT	L	TR4 → improves access to tourist sites + development of transport-based tourist facilities → increased footfall at tourist attractions → increased revenue from tourism sector.
		TR6RA1	+	Bradford District	T/R	LT	L	
TR7	+	Bradford District	T/R	LT	M			
TR8	○	n/a	n/a	n/a	n/a			
19. Economy		TR1	+	Bradford District	T/R	LT	M	TR5 → enhanced accessibility of more isolated areas → increase in visitors to these areas → increased visitor spend in these areas.
		TR1RA1	+	Bradford District	T/R	LT	L	
		TR2	○	n/a	n/a	n/a	H	
		TR2RA1	○	n/a	n/a	n/a	H	TR6 → development of Bradford's freight industry → increased employment opportunities and growing revenues in the freight sector
		TR3	+	Bradford District	T/R	LT	M	
		TR3RA1	+	Bradford District	T/R	LT	L	
		TR4	++	Bradford District	T/R	LT	M	
		TR5	+	Bradford District	T/R	LT	M	TR8 → safeguards the operation of Leeds-Bradford airport → continued economic viability of the airport.
		TR5RA1	+	Bradford District	T/R	LT	L	
		TR6	++	Bradford District	T/R	LT	L	Impacts of TR2RA1, TR3RA1, TR5RA1 and TR6RA1 → similar to preferred options but lesser magnitude and lower probability.
		TR6RA1	+	Bradford District	T/R	LT	L	
TR7	+	Bradford District	T/R	LT	M			
TR8	○	n/a	n/a	n/a	n/a			

Summary of, and assumptions in the assessment of, **Thematic Policies: Housing Policy HO1 only**

**Policy HO1: The District's Housing Requirement** is under review. The Council's preferred option is to pursue a housing requirement of 1,703 dwellings per annum (dpa). In line with the NPPF, the Council undertook a Local Housing Need Assessment by applying the standard method in national planning guidance using robust and up to date evidence. The Council then considered whether local circumstances indicated if housing need is higher than the standard method. This has been assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Finally, the Council then considered whether it is feasible and appropriate to plan for this level of housing growth bearing in mind constraint factors such as deliverability, land supply, environmental impacts and Green Belt. This method identified a minimum housing need of 1,703 dpa. In line with the PPG the Council considered if there are any factors to justify an uplift to the LHN figure but concluded that there were not.

- **Policy HO1 Reasonable Alternative 1 (HO1RA1):** The first reasonable alternative considered by the Council would be to have no policy change from the housing requirement policy in the existing adopted Core Strategy. This would result in the housing requirement of 2,476 dpa being carried over into the CSPR.
- **Policy HO1 Reasonable Alternative 2 (HO1RA2):** The second reasonable alternative considered by the Council would be to pursue a housing requirement lower than the identified housing need of 1,703 dpa.

The delivery of new housing in Bradford would be expected to make a positive contribution towards SA Objectives related to the economy and society. The provision of new homes would help to ensure that local people can live high-quality, healthy and safe lives at home situated within sustainable communities and with access to key services (such as health and education facilities) in the District. New homes would also be expected to provide a boost to the local economy whilst also enhancing the accessibility of employment opportunities in Bradford for new people. Generally speaking, it is likely that these benefits would be of a greater magnitude where a greater number of homes is delivered. HO1 and HO1RA1 would, as a minimum, ensure that the housing needs of Bradford are satisfied whereas HO1RA2 would not satisfy this requirement.

The construction and occupation of new homes can pose a risk to natural environment related SA Objectives and, generally speaking, the greater the number of homes the greater the risk. This is because the construction and occupation of new homes can lead to a less sustainable approach to the use of land (it is likely that higher housing requirements would require greater amounts of greenfield land to be developed upon) whilst impacts landscape character, historic character/setting, biodiversity, and the local ecological network are more likely.

The HRA screening of the CSPR has not been able to objectively rule out an LSE on the South Pennine Moors SAC and SPA, primarily as a result of the cumulative impact of all new development on recreational disturbances at the designation. This is due to be further explored in the appropriate assessment that will be prepared prior to Regulation 19 consultation on the CSPR. Impacts through the pathways of water quality, water resources, air quality and urbanisation impacts will also be explored. Whilst an LSE has not yet been able to be ruled out, it is expected that the HRA appropriate assessment will, if considered to be necessary, determine appropriate avoidance and mitigation measures for inclusion in the CSPR that will ultimately ensure an LSE does not arise.

The provision of greater number of homes would also be likely to make it increasingly difficult to ensure a sustainable approach to the management and consumption of resources, such as construction materials, water, fuel and food. As resource consumption increases so too would the generation of waste and pollutants (including GHG emissions and particulate matter into the air as well as potentially contamination or pollution risks of waterbodies). Higher housing requirements would be likely result in the Council having less freedom or choice over where to situate new homes. For example, the highest housing requirement of HO1RA1 would be likely to necessitate more land being released from the Green Belt to accommodate the new development than HO1 and HO1RA2 would. The potentially negative impacts of new development on the natural environment would typically be of an increasingly greater magnitude where more homes are proposed and, as such, HO1RA2 could pose a less severe risk to the natural environment than HO1. HO1 would in turn be likely to pose less of a risk to the natural environment than HO1RA1.

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It is likely that many of the negative impacts associated with the construction and occupation of new homes will be mitigated to some extent by other policies in the CSPR. For example, negative impacts on biodiversity or ecological networks are likely to be limited by the proposed policies EN2a and EN2b. The appraisals in this table are of HO1 and its alternatives only. The potentially mitigating impact of other policies are only factored in during the cumulative effects appraisal.

**Note on recommendations for HO1 and its alternatives:** The intention of HO1 is to establish the housing requirement for the District and therefore many of the potential negative impacts predicted for policy HO1 are inherent risks associated with all new development. Policies that would be likely to help manage the proposed residential development in a manner that mitigates negative impacts are included in the assessment text for each SA Objective where appropriate.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
1. Energy & GHGs		HO1	--	Bradford district	P/I	LT	M	HO1, HO1RA1 & HO1RA2 → significant increase in residential energy consumption + increase in residents' use of cars → significant increase in GHG emissions. Greatest magnitude with HO1RA1, lowest with HO1RA2. <b>Recommendations:</b> Use of renewable and low carbon energy (SC6 & EN6), offset and mitigate emissions (EN8), ensure good sustainable and active travel links (TR1, TR3, TR7, DS4, SC2-SC5, SC9 & SC10).
		HO1RA1	--	Bradford district	P/I	LT	M	
		HO1RA2	--	Bradford district	P/I	LT	M	
2. Waste		HO1	-	Bradford district	T/R	LT	H	HO1, HO1RA1 & HO1RA2 → significant construction + increase in residents → increase in construction & residential waste. Greatest magnitude with HO1RA1, lowest with HO1RA2. <b>Recommendations:</b> Provision of waste and recycling facilities (HO9), reusing existing housing stock where possible (SC2 & HO10), following the waste hierarchy to reduce, reuse and recycle materials (WM1).
		HO1RA1	--	Bradford district	T/R	LT	H	
		HO1RA2	-	Bradford district	T/R	LT	H	
3. Land & buildings		HO1	--	Bradford district	T/I	LT	M	HO1, HO1RA1 & HO1RA2 → significant number of new homes → significant quantity in land developed on, including greenfield land. Greatest magnitude with HO1RA1, lowest with HO1RA2. <b>Recommendations:</b> Reuse of PDL and existing housing stock where possible (SC2, SC5 & HO10) and minimising greenfield and greenbelt release.
		HO1RA1	--	Bradford district	T/I	LT	M	
		HO1RA2	-	Bradford district	T/I	LT	M	
4. Climate change		HO1	-	Bradford district	T/I	LT	M	HO1, HO1RA1 & HO1RA2 → significant number of new homes → likely that some will be situated on land at risk of flooding + loss of greenfields could increase flood risk. Greatest magnitude with HO1RA1, lowest with HO1RA2. <b>Recommendations:</b> Inclusion of GI, SUDs and flood storage into developments (EN7) and require development proposals to include measure to mitigate effects of climate change (SC10).
		HO1RA1	-	Bradford district	T/I	LT	M	
		HO1RA2	-	Bradford district	T/I	LT	M	
5. Water resources		HO1	-	Bradford district	T/I	LT	M	HO1, HO1RA1 & HO1RA2 → significant increase in residential water consumption. HO1, HO1RA1 & HO1RA2 → significant construction → pollution & contamination risk to water quality. Greatest magnitude with HO1RA1, lowest with HO1RA2. <b>Recommendations:</b> Minimise runoff from developments (EN7) and ensure developments use water resources sustainably (SC2).
		HO1RA1	-	Bradford district	T/I	LT	M	
		HO1RA2	-	Bradford district	T/I	LT	M	
6. Biodiversity & geodiversity		HO1	--	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → new residents → increase in public access associated disturbances on wildlife. HRA screening has not been able to rule out an LSE on the South Pennine Moors SAC/SPA as a result of cumulative recreation pressure from all new residents. HO1, HO1RA1 & HO1RA2 → significant construction + loss of greenfield → direct loss of wildlife + impacts on ecological connectivity. <i>Greatest magnitude with HO1RA1, lowest with HO1RA2.</i> <b>Recommendations:</b> Inclusion of GI to contribute to the District's ecological network (SC4, DS2 & DS3).
		HO1RA1	--	Bradford district	T/R	LT	M	
		HO1RA2	--	Bradford district	T/R	LT	L	
7. Landscape & townscape		HO1	+/-	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant new development → loss of open spaces → potential negative impacts on natural landscape character with approximately 5000 homes allocated in Green Belt + potential negative impacts on setting of heritage assets & historic areas. HO1, HO1RA1 & HO1RA2 → redevelopment of brownfield sites → enhancement to local character + enhancement to setting of heritage assets & historic areas
		HO1RA1	-	Bradford district	T/R	LT	L	
		HO1RA2	+/-	Bradford district	T/R	LT	L	
8. Cultural heritage		HO1	+/-	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → new development → opportunities for new archaeological discoveries. <b>Recommendations:</b> Ensure housing is in-keeping with the local character and setting (HO8, HO9, DS1-DS5).
		HO1RA1	-	Bradford district	T/R	LT	L	
		HO1RA2	+/-	Bradford district	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
9. Air quality		HO1	--	Bradford district	P/I	LT	M	HO1, HO1RA1 & HO1RA2 → significant increase in residential energy consumption + increase in residents' use of cars → increase in air pollution → 70% of housing allocation in regional city and principal towns → potential to exacerbate existing air quality issues particularly within the AQMAs, including Manningham Lane, Thornton Road, Mayo Avenue/Manchester Road and Shipley Road. Greatest magnitude with HO1RA1, lowest with HO1RA2.
		HO1RA1	--	Bradford district	P/I	LT	M	
		HO1RA2	--	Bradford district	P/I	LT	M	
10. Transport		HO1	-	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant increase in residents → increase in pressure on capacity of public transport system & walking and cycling routes. Greatest magnitude with HO1RA1, lowest with HO1RA2. <b>Recommendations:</b> <i>Use of renewable and low carbon energy (SC6 &amp; EN6), ensure good sustainable and active travel links (TR1, TR3, TR7, DS4, SC2-SC5, SC9 &amp; SC10) and provision of electric car charging points (SC2).</i>
		HO1RA1	-	Bradford district	T/R	LT	L	
		HO1RA2	-	Bradford district	T/R	LT	L	
11. Housing		HO1	++	Bradford district	T/R	LT	H	HO1 → satisfy minimum housing need in Bradford over Plan-period. HO1RA1 → exceed the minimum housing need in Bradford + provide buffer. HO1RA2 → would fall short of satisfying the identified housing need in Bradford.
		HO1RA1	++	Bradford district	T/R	LT	H	
		HO1RA2	--	Bradford district	T/R	LT	H	
12. Range of accessible services		HO1	+/-	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant number of new homes → new residents able to access services and cultural assets in Bradford whilst increase in demand could validate the provision of new services & assets. HO1, HO1RA1 & HO1RA2 → significant number of new homes → growth in residents → additional pressure potentially placed on the capacity of existing services.
		HO1RA1	+/-	Bradford district	T/R	LT	L	
		HO1RA2	+/-	Bradford district	T/R	LT	L	
13. Social Cohesion		HO1	+/-	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant number of new homes → reduced deprivation + local people able to live within existing communities
		HO1RA1	+/-	Bradford district	T/R	LT	L	
		HO1RA2	+/-	Bradford district	T/R	LT	L	
14. Culture & leisure		HO1	+/-	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant number of new homes → risk of altering the balance or cohesion of local communities. Greatest magnitude with HO1RA1, lowest with HO1RA2.
		HO1RA1	+/-	Bradford district	T/R	LT	L	
		HO1RA2	+/-	Bradford district	T/R	LT	L	
15. Safe & secure		HO1	+/-	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant number of new homes + increase in number of residents → increase in potential victims of crime + developments that attract crime. HO1, HO1RA1 & HO1RA2 → significant number of new homes → safe accommodation for local people. <b>Recommendations:</b> <i>Ensure housing design is high quality and promotes safety and security (SC2 &amp; SC10).</i>
		HO1RA1	+/-	Bradford district	T/R	LT	L	
		HO1RA2	+/-	Bradford district	T/R	LT	L	
16. Health		HO1	?	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant number of new homes → enable healthy lifestyles at home + provide good access to health facilities such as hospitals & GP surgeries. HO1, HO1RA1 & HO1RA2 → increase in local population → increased pressure on capacity of existing health services → uncertain if growth of residential development would place the existing services under excessive pressure or if it would make the delivery of improved/new services more viable
		HO1RA1	?	Bradford district	T/R	LT	L	
		HO1RA2	?	Bradford district	T/R	LT	L	
17. Education		HO1	?	Bradford district	T/R	LT	L	HO1, HO1RA1 & HO1RA2 → significant number of new homes → potentially good access to education facilities depending on location of development. HO1, HO1RA1 & HO1RA2 → increase in local population → increased pressure on capacity of existing education facilities → uncertain if growth of residential development would place the existing services under excessive pressure or if it would make the delivery of improved/new services more viable
		HO1RA1	?	Bradford district	T/R	LT	L	
		HO1RA2	?	Bradford district	T/R	LT	L	
18. Employment		HO1	+	Bradford district	T/R	LT	L	HO1, HO1RA1 → new homes → new residents with good access to Bradford's employment market. HO1, HO1RA1 & HO1RA2 → construction of new homes → boost to housing market in Bradford → boost to local economy.
		HO1RA1	+	Bradford district	T/R	LT	L	
		HO1RA2	-	Bradford district	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
19. Economy		HO1	+	Bradford district	T/R	LT	L	HO1, HO1RA1 → increase in local population of working-age → boost to local businesses. Greatest magnitude with HO1RA1. HO1RA2 → not enough housing to accommodate population growth → constrained employment pool potentially unable to facilitate regenerative economic growth.
		HO1RA1	+	Bradford district	T/R	LT	L	
		HO1RA2	-	Bradford district	T/R	LT	L	

### Summary of, and assumptions in the assessment of, **Thematic Policies: Housing Policy HO3 only**

The overall spatial distribution of development through Policy HO3 is under review. The Council has considered six reasonable alternatives to their preferred approach.

#### **Regional City: Bradford City**

Generally speaking, it is considered that options that direct a large proportion of development towards the Regional City of Bradford would help to regenerate the city, including through situating high-quality development on PDL and by significantly enhancing the local housing and employment offering. The city benefits from an efficient transport network that new residents would benefit from, including good public transport links as well as walking and cycling routes. New residents in the city would also be within a short distance of a wide range of key services, amenities, facilities, communal spaces and cultural activities. For example, access to schools and doctors for people in the City is likely to be better than it is for those living in smaller or more rural settlements, although given the larger local population there could in some case be a risk of stretching the capacity of services. It is also assumed that opportunities for including renewable energy generation technology in new developments, such as solar panels on roofs, are more likely to be in established urban areas rather than smaller or more rural settlements. Challenges to development in the city include ensuring that sites are viable, deliverable and available. There is a need to ensure that there is adequate provision of a good choice of housing given the existing abundance of apartments in the City Centre. Some environmental constraints also exist in the centre, including Flood Zones 2 and 3 associated with the River Aire, a high concentration of heritage assets including the Saltaire World Heritage Site and green & open space provision. Development in the Regional City would also be likely to require the release of Green Belt land from some areas and this could pose a risk to the biodiversity, landscape character and soils in these locations.

#### **Principal Towns: Ilkley, Keighley and Bingley**

Development in Principal Towns, such as Bingley and Ilkley, would be expected to make a major contribution towards regeneration of the towns through housing and economic development and the creation of new jobs and sustainable places to live. A key challenge in the Principal town of Keighley is to tackle the high rates of deprivation, which the delivery of new houses and affordable houses in particular would help achieve. Principal Towns are assumed to have a wide range of key services, amenities and facilities that are generally accessible via public transport modes, walking and cycling and so situating new residents in these locations would be a socially sustainable approach. The Principal Towns are generally well served by bus routes, although Ilkley lacks a high frequency bus route, whilst the Towns generally benefit from railway stations providing access to the Regional City and elsewhere. Development in Principal Towns would be expected to result in the loss of greenfield land as opportunities for PDL are generally more limited. This would include some Green Belt land. In some cases, development at the Principal Towns could therefore pose a greater risk to the local character, setting, ecological connectivity and amenity than development in the Regional City would.

#### **Local Growth Centres (LGCs): Burley in Wharfedale, Menston, Queensbury, Thornton, Steeton with Eastburn, Silsden (located along key road and public transport**

**corridors), Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton**

Development in Local Growth Centres would provide an opportunity to enhance the local provision of housing, public transport, services and employment land as well as the general quality of the natural and built environment. It is considered that some services and public transport options are somewhat more limited in Local Growth Centres when compared with Principal Towns and the Regional City - Burley, Menston and Steeton have railway stations whilst the others do not, and so new residents in these locations could potentially have a slightly higher reliance on personal car use coupled with slightly longer distances to travel to access certain types of services or jobs, although it should be noted that LGCs have ready access to the City and Principal Towns. The Local Growth Centres are typically in semi-rural locations where there is the potential for development to have a negative impact on habitats, species and ecological connectivity as well as distinctive natural landscapes.

**Local Service Centres (LSCs): Addingham, Baildon, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Oakworth, Oxenhope**

Local Service Centres are considered to be relatively small settlements in mostly rural locations. Opportunities for using PDL are likely to be restricted in these locations, and development in Cottingley, Baildon, Burley, Addingham, Harden and Wilsden could result in the loss of Grade 3 ALC soils (depending on the precise location of development, although given the prevalence of BMV soils here avoiding losses in all cases could be unachievable). Access to public transport modes and walking and cycling routes that link people with key services and amenities is limited. It is considered to be likely that in some instances development in Local Service Centres could pose a greater risk to habitats, species, ecological connectivity, natural landscapes and waterbodies than development in larger settlements would. For example, Haworth and Oakworth are in close proximity to the South Pennine Moors SAC and SPA. The local range of services, amenities, cultural activities, schools and jobs is likely to be more limited than in larger settlements and so new residents here may need to travel relatively far to access some services, potentially having a high reliance on personal car use for doing so. In many ways, development in these locations could therefore be seen as being less sustainable than in the Regional City for example, however there is a need to ensure that local development needs, including for affordable housing, are satisfied to ensure that local centres remain viable and to reduce rates of deprivation, inequality and homelessness. The Local Service Centres are typically historic villages host to a several Listed Buildings, such as the 16 Grade II Listed Buildings present in Cullingworth.

**Policy HO3: Distribution of Housing Requirement** is under review. The Council's preferred option is to meet the District-wide housing requirement of 26,150 homes by directing:

- 18,400 (70%) homes towards the Bradford Regional City;
- 4,100 (15%) homes towards Principal Towns;
- 2,600 (10%) homes towards Local Growth Centres; and
- 1,050 (5%) homes towards Local Service Centres.

This distribution has arisen from the Council's approach of seeking to ensure the distribution is aligned with the CSPR Vision and Objectives; aligns with the District's settlement hierarchy; maximises the benefits of growth such as regeneration; and minimises the potential negative impacts of growth, such as on the natural environment. The proportion of growth directed towards each settlement tier has changed a little compared to that proposed in the Adopted Core Strategy, primarily because of the lower housing requirement and the updated land supply. The preferred option would require around 5,000 homes to be accommodated within current green belt with green belt releases in 12 of the 27 different settlements and sub areas. This is significantly lower than the 11,000 homes required for Green Belt land in the adopted Core Strategy.

**HO3 Reasonable Alternative 1 (HO3RA1)** would be population proportionate. In comparison with the Council's preferred option, there would be approximately 806 fewer homes directed towards the Regional City of Bradford and they would be distributed markedly differently with minimal development in the two regeneration areas of the City Centre and Canal Rd Corridor and significantly more in other areas including Bradford NE. There would be 689 fewer homes directed towards Local Growth Centres. These homes would predominantly be directed towards Local Service Centres instead, such as Baildon. The amount of development within the Principal Towns would be similar but with slightly more development within Ilkley and slightly less within Keighley.

**HO3 Reasonable Alternative 2 (HO3RA2)** would be based on the Adopted Core Strategy Proportions. This approach distributes the new lower District-wide housing requirement in exactly the same proportions as in the Adopted Core Strategy. This approach would see 65% of new homes directed towards the Regional City, compared with the 70% proposed in the preferred option. HO3RA2 would then direct a slightly larger proportion of new homes towards Principal Towns, Local Growth Centres and Local

Service Centres than the preferred option would. This approach would be highly likely to lead to a greater quantity of Green Belt release and at more settlements (19 rather than 12) than the preferred option.

**HO3 Reasonable Alternative 3 (HO3RA3)** would be to conform with the settlement hierarchy but to avoid releasing any land from the Green Belt. It would not assume that any further increase in densities compared to those projected within the SHLAA would be secured. This approach would result in a significant shortfall of around 3,700 in the District-wide housing requirement. Development would be focused on the Regional City and Principal Towns. Those settlements with minimal non green belt land supply options would see the greatest reductions compared to the preferred option – for example Ilkley despite being a Principal Town would only see 150 new homes.

**HO3 Reasonable Alternative 4 (HO3RA4)** would be to conform with the settlement hierarchy but to avoid releasing any land from the Green Belt. In order to achieve this, a higher density of development would be required in the non-Green Belt locations to avoid a shortfall of around 3,700 homes of the District’s housing need. Whilst the shortfall could be made up by assuming a density uplift of 20% in the regional city, 10% in the principal towns and 5% in the local growth centres, there is a risk that this would not be achievable or would not entirely account for the shortfall. It could therefore fail to accommodate all of Bradford’s housing needs. There is also a risk that this approach would undermine proposals for regeneration in areas such as Holme Wood where green belt releases would be linked to urban regeneration and investment within settlement and where non-Green Belt site options are relatively limited.

**HO3 Reasonable Alternative 5 (HO3RA5)** This is a variant on the preferred option but increases the distribution in certain areas such as the City Centre, Keighley and Bradford SE on the assumption that as yet unidentified potential might be realised via intensification and density uplift. If pursued and if found to be a realistic and deliverable option it would reduce the scale and number of locations for green belt change compared to the preferred option, however with this alternative comes greater uncertainty.

**HO3 Reasonable Alternative 6 (HO3RA6)** is a variant of the preferred option that would seek to decrease the concentration on the regional city dispersing more development to the areas of the district with higher housing market value, in the bottom two tiers of the settlement hierarchy. This would increase the overall scale of green belt releases and very significantly increase green belt releases in the Local Growth Centres and Local Service Centres.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		HO3	++	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → facilitates high rates of walking, cycling & public transport + good opportunities for energy efficiency & renewable energy generation. HO3RA1 & HO3RA2 → largely similar impact to HO3 but of a slightly lower magnitude due to less development directed towards the Regional City. HO3RA3 → majority of development directed towards Regional City → lower-emission travel + more opportunities for renewable & efficient energy. This option accommodates a lower quantity of development which could enable more efficient energy networks and more opportunities for renewable energy. HO3RA4 → majority of development directed towards Regional City & Principal Towns + no development on Green Belt → development likely to be in locations with good sustainable transport options + shorter distances to travel. HO3RA5 → more development directed towards Regional City & Principal Towns than other options and so could enable more low-emission travel & renewable energy generation than other options but there is a low probability of this being feasible. HO3RA6 → directs less development to Regional City than preferred option and directs more to LGCs & LSCs → higher reliance on personal car use + more limited options for efficient energy networks & renewable energy generation.
		HO3RA1	+	Bradford district	P/I	LT	M	
		HO3RA2	+	Bradford district	P/I	LT	M	
		HO3RA3	++	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	++	Bradford district	P/I	LT	L	
		HO3RA6	-	Bradford district	P/I	LT	M	
		HO3	+	Bradford district	T/R	LT	M	HO3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns → housing likely to

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2. Waste		HO3RA1	+	Bradford district	T/R	LT	M	be served by kerbside collection of wider variety of recyclables than in smaller settlements & short travel distances for collection vehicles. Range of recycling facilities likely greater in City & Towns than it is in smaller settlements. HO3RA1 & HO3RA2 → largely similar impact but of a slightly lower magnitude due to less development directed towards the Regional City. HO3RA3 → majority of development directed towards Regional City → lower-emission travel + more opportunities for renewable & efficient energy. This option accommodates a lower quantity of development which could result in less construction & household waste. HO3RA5 → similar impact to HO3 but of a slightly greater magnitude due to higher proportion of development directed towards Regional City & Principal Towns but there is a low probability of this being feasible. HO3RA6 → directs more development towards LGCs and LSCs than other options → potential for more limited recycling opportunities for local people.
		HO3RA2	+	Bradford district	T/R	LT	M	
		HO3RA3	+	Bradford district	T/R	LT	M	
		HO3RA4	+	Bradford district	T/R	LT	M	
		HO3RA5	+	Bradford district	T/R	LT	L	
		HO3RA6	-	Bradford district	T/R	LT	M	
3. Land & buildings		HO3	+/-	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → good opportunities for PDL however approximately 5,000 homes on Green Belt land → likely loss of greenfield. HO3RA1 → directs more development to Green Belt than preferred option and avoids PDL sites. HO3RA2 → largely similar impact to HO3 but of a slightly lower magnitude due to less development directed towards the Regional City. HO3RA3 → majority of development directed towards Regional City → good opportunities for PDL + option avoids using any Green Belt. This option accommodates a lower quantity of development which result in a reduced quantity of land-use. HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt release. HO3RA5 → similar impact to HO3 but of a slightly more positive due to higher proportion of development directed towards Regional City & Principal Towns but there is a low probability of this being feasible. HO3RA6 → less development in Regional City & Principal Towns and more development in locations where high uptake of greenfield is likely, including land containing BMV soils, to be necessary with significant Green Belt release.
		HO3RA1	-	Bradford district	P/I	LT	M	
		HO3RA2	+/-	Bradford district	P/I	LT	M	
		HO3RA3	++	Bradford district	P/I	LT	M	
		HO3RA4	++	Bradford district	P/I	LT	M	
		HO3RA5	+	Bradford district	P/I	LT	L	
		HO3RA6	-	Bradford district	P/I	LT	M	
4. Climate change resilience		HO3	?	Bradford district	P/I	LT	L	Whilst options that direct more development towards the Regional City and Principal Towns could be considered to be less likely to alter local flood risk due less development in locations that could alter flood risk, the impacts on vulnerability to climate change largely depends on the precise location of development. There are extensive areas of Flood Zone 3 within and around the Regional City, as well along the Airedale and Wharfedale corridors and it is uncertain which spatial options would result in more development in these Flood Zones than others,
		HO3RA1	?	Bradford district	P/I	LT	L	
		HO3RA2	?	Bradford district	P/I	LT	L	
		HO3RA3	?	Bradford district	P/I	LT	L	
		HO3RA4	?	Bradford district	P/I	LT	L	
		HO3RA5	?	Bradford district	P/I	LT	L	
5. Water resources		HO3	+/-	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → limit the amount of development on greenfield sites in the countryside, although not entirely as HO3 uses some Green Belt → limited risk of pollution or contamination of natural waterbodies although it could pose a risk to the quality of the Beck. HO3RA5 would have largely similar impacts to HO3 but with slightly less Green Belt release and subsequently less scope for negative impacts, although there is a low probability of this option being achievable. HO3RA1 → significant majority of development directed towards Green Belt and avoids PDL. HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3, potentially involving more Green Belt release → greater risk of development negatively impacting the quality of natural waterbodies.
		HO3RA1	-	Bradford district	P/I	LT	M	
		HO3RA2	+/-	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		HO3RA5	+	Bradford district	P/I	LT	L	HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → slightly more limited risk of pollution or contamination of natural waterbodies than HO3. Could pose a risk to the quality of the Beck. HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → high risk of negative impacts on water quality as a result of development on greenfield.
		HO3RA6	-	Bradford district	P/I	LT	M	
6. Biodiversity & geodiversity		HO3	+/-	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → limited development on greenfield sites although not entirely as HO3 uses some Green Belt → limited risk of negative impacts on designations, habitats and ecological connectivity. HO3RA5 would have largely similar impacts to HO3 but with slightly less Green Belt release and subsequently less scope for negative impacts, although there is a low probability of this option being achievable. HO3RA1 → significant majority of development directed towards Green Belt and avoids PDL. HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3, potentially involving more Green Belt release → greater risk of development negatively impacting designations, habitats and ecological connectivity. HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → lowest risk of negative impacts on habitats, designations & connectivity. HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → highest risk of negative impacts on habitats, connectivity and designations including the South Pennine Moors SPA/SAC and various stands of Ancient Woodland.
		HO3RA1	-	Bradford district	P/I	LT	M	
		HO3RA2	+/-	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	+	Bradford district	P/I	LT	L	
		HO3RA6	-	Bradford district	P/I	LT	M	
7. Landscape & townscape		HO3	+	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → limited development on greenfield sites although not entirely as HO3 uses some Green Belt → limited risk of negative impacts on landscape character + opportunities for enhancing townscape character. HO3RA5 would have largely similar impacts to HO3 but with slightly less Green Belt release and subsequently less scope for negative impacts, although there is a low probability of this option being achievable. HO3RA1 → significant majority of development directed towards Green Belt and avoids PDL. HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3, potentially involving more Green Belt release → greater risk of negative impacts on character with slightly more limited options for enhancing townscapes than under HO3. HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → lowest risk of negative impacts landscapes with good opportunities for enhancing townscapes. HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → highest risk of negative impacts natural landscape character with limited options for using PDL and enhancing townscapes.
		HO3RA1	-	Bradford district	P/I	LT	M	
		HO3RA2	+/-	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	+	Bradford district	P/I	LT	L	
		HO3RA6	-	Bradford district	P/I	LT	M	
8. Cultural heritage		HO3	+/-	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → large number of heritage assets & historic features → good opportunities for development to enhance their setting on PDL although there would be some development in small rural settlements as well as some Green Belt release and development in these locations could discord with the existing setting in some cases. HO3RA5 would have largely similar impacts to HO3 but with slightly less Green Belt release and subsequently less scope for negative impacts, although there is a low probability of this option being achievable. HO3RA1 → significant majority of development directed towards Green Belt and avoids PDL. HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3, potentially involving more Green Belt release → greater risk of development discording with the setting of heritage assets,
		HO3RA1	-	Bradford district	P/I	LT	M	
		HO3RA2	+/-	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	

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		HO3RA5	+	Bradford district	P/I	LT	L	particularly as small rural settlements have a large number of Listed Buildings. HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → lowest risk of discording with setting combined with good opportunities for enhancing setting. HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → highest risk of negative impacts on setting of heritage assets with restricted opportunities for enhancing setting.
		HO3RA6	-	Bradford district	P/I	LT	M	
9. Air quality		HO3	+/-	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → facilitates high rates of walking, cycling & public transport. HO3RA1 & HO3RA2 → largely similar impact to HO3 but of a slightly lower magnitude due to less development directed towards the Regional City. HO3RA3 & HO3RA4 → majority of development directed towards Regional City, even more so than HO3 with no development on Green Belt → more efficient & lower-emission travel combined with reduced need to travel. HO3 option accommodates a lower quantity of development which could result in less air pollution from development. HO3RA5 → more development directed towards Regional City & Principal Towns than other options and so could enable more low-emission travel than other options but there is a low probability of this option being feasible. HO3RA6 → directs less development to Regional City than preferred option and directs more to LGCs & LSCs → likely higher reliance on personal car use for new residents than other options coupled with longer distances to travel to access some key services and amenities. Options that focus development in the City and Principal Towns would be likely to enable lower-pollution lifestyles of new residents, such as due to good access to convenient and frequent public transport options. However, there air quality in Bradford is already poor in some locations, with four AQMA designations, and focussing the majority of development in the City could potentially make achieving air quality improvement targets at these AQMAs more difficult without significant efforts to avoid and mitigate the impacts of development on air quality.
		HO3RA1	+/-	Bradford district	P/I	LT	M	
		HO3RA2	+/-	Bradford district	P/I	LT	M	
		HO3RA3	+/-	Bradford district	P/I	LT	M	
		HO3RA4	+/-	Bradford district	P/I	LT	M	
		HO3RA5	+/-	Bradford district	P/I	LT	L	
		HO3RA6	-	Bradford district	P/I	LT	M	
10. Transport		HO3	+/-	Bradford district	P/I	LT	M	Options that focus development in the City and Principal Towns would be likely to enable lower-pollution lifestyles of new residents, such as due to good access to convenient and frequent public transport options. However, there air quality in Bradford is already poor in some locations, with four AQMA designations, and focussing the majority of development in the City could potentially make achieving air quality improvement targets at these AQMAs more difficult without significant efforts to avoid and mitigate the impacts of development on air quality.
		HO3RA1	+/-	Bradford district	P/I	LT	M	
		HO3RA2	+/-	Bradford district	P/I	LT	M	
		HO3RA3	+/-	Bradford district	P/I	LT	M	
		HO3RA4	+/-	Bradford district	P/I	LT	M	
		HO3RA5	+/-	Bradford district	P/I	LT	L	
		HO3RA6	-	Bradford district	P/I	LT	M	
11. Housing		HO3	++	Bradford district	P/I	LT	M	HO3, HO3RA1, HO3RA2 & HO3RA5 → accommodate a quantity of housing, as well as a mix of housing types and affordability, that satisfies housing requirements of the District on the whole as well as at different settlements and also enhances the viability of different areas of the District and leads to some regeneration. There is a low probability of HO3RA5 being achievable. HO3RA3 → likely shortfall of approximately 5,000 of the District's housing requirements overall. Some settlements likely to have a greater shortfall than others + places a squeeze on the provision of affordable housing. HO3RA4 → likely shortfall of the District's housing requirements overall, potentially a shortfall of up to 3,700. Some settlements likely to have a greater shortfall than others + places a squeeze on the provision of affordable housing. HO3RA6 → would be likely to satisfy the overall District housing requirement + significant regeneration in smaller and more rural settlements although there is a risk of limited regeneration in the Regional City and some Principal Towns.
		HO3RA1	++	Bradford district	P/I	LT	M	
		HO3RA2	++	Bradford district	P/I	LT	M	
		HO3RA3	--	Bradford district	P/I	LT	M	
		HO3RA4	--	Bradford district	P/I	LT	M	
		HO3RA5	++	Bradford district	P/I	LT	L	
		HO3RA6	++	Bradford district	P/I	LT	M	
12. Range of accessible services		HO3	++	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → excellent access to key services, amenities, facilities and cultural spaces for new residents. Development could also facilitate the provision of expanded or new services and facilities. HO3 → portion of development directed towards LGCs and LSCs → could enable the provision of new services and amenities in these smaller settlements too. HO3RA5 would have largely similar impacts to HO3 but due to slightly less Green Belt release new residents could be in closer proximity to services and amenities, although there is a low probability of this option being achievable. HO3RA1 & HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3
		HO3RA1	++	Bradford district	P/I	LT	M	
		HO3RA2	++	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	++	Bradford district	P/I	LT	L	
		HO3RA6	+/-	Bradford district	P/I	LT	M	

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13. Social Cohesion		HO3	++	Bradford district	P/I	LT	M	→ new residents may have slightly more limited access to key services, amenities, facilities and cultural spaces but development could facilitate the provision of new or expanded services in these locations to a greater extent than HO3.  HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → residents likely to have excellent access to key services, amenities, facilities and cultural spaces. However, HO3RA3 & HO3RA4 → more limited quantity of new development → uncertain the extent to which they would facilitate the provision of new services to the same extent as other options.
		HO3RA1	++	Bradford district	P/I	LT	M	
		HO3RA2	++	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	++	Bradford district	P/I	LT	L	
		HO3RA6	+/-	Bradford district	P/I	LT	M	
14. Culture & leisure		HO3	++	Bradford district	P/I	LT	M	HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → highest risk of new residents having to travel relatively far to access some services, amenities, facilities and cultural spaces, but option could provide greatest benefit to LSCs & LGCs by facilitating the provision of new services etc.
		HO3RA1	++	Bradford district	P/I	LT	M	
		HO3RA2	++	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	++	Bradford district	P/I	LT	L	
		HO3RA6	+/-	Bradford district	P/I	LT	M	
15. Safe & secure		HO3	+/-	Bradford district	P/I	LT	L	Crime rates are typically higher in the Regional City, Principal Towns and larger settlements in the District. Options that direct more development to these locations could therefore expose a larger proportion of new residents to higher rates of crime → this is true for most options, including HO3, HO3RA1, HO3RA2, HO3RA3, HO3RA4 & HO3RA5. There is a low certainty of this as impacts largely depend on precise location of development.  HO3, HO3RA1, HO3RA2, HO3RA5 & HO3RA6 → satisfy development requirements → enhance the safety, security of people's lives due to reduced homelessness, deprivation, inequality & poverty → potential regenerative effects of development on PDL and urban sites.  HO3RA3 & HO3RA4 → would be unlikely to accommodate enough development to satisfy requirements → more limited reduction in homelessness, deprivation, inequality & poverty.
		HO3RA1	+/-	Bradford district	P/I	LT	L	
		HO3RA2	+/-	Bradford district	P/I	LT	L	
		HO3RA3	-	Bradford district	P/I	LT	L	
		HO3RA4	-	Bradford district	P/I	LT	L	
		HO3RA5	+/-	Bradford district	P/I	LT	L	
		HO3RA6	+/-	Bradford district	P/I	LT	L	
16. Health		HO3	+	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → excellent access to health services but potentially more limited access to open space or countryside in some locations. Development could also facilitate the provision of expanded or new services. HO3 → portion of development directed towards LGCs and LSCs → could enable the provision of new health services in these smaller settlements too.  HO3RA5 would have largely similar impacts to HO3 but due to slightly less Green Belt release new residents could be in closer proximity to health services, although there is a low probability of this option being achievable. HO3RA1 & HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3 → new residents may have slightly more limited access to health services but development could facilitate the provision of new or expanded services in these locations to a greater extent than HO3. Potential for new residents to also have slightly better access to open spaces/countryside/habitats than HO3.  HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → residents likely to have excellent access to health services although potentially limited access to countryside/open space/habitats. HO3RA3 & HO3RA4 → more limited quantity of new development → uncertain whether they would facilitate the provision of new services to the same extent as other options.  HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → highest risk of new residents having to travel relatively far to access some health services, but option could facilitate the provision of new services at LSCs & LGCs. New residents likely to have excellent access to countryside/open space/habitats.
		HO3RA1	+	Bradford district	P/I	LT	M	
		HO3RA2	+	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	+	Bradford district	P/I	LT	L	
		HO3RA6	+	Bradford district	P/I	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
17. Education		HO3	+	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → excellent access to education opportunities. Development could also facilitate the provision of expanded or new education opportunities in LGCs and LSCs. HO3RA5 would have largely similar impacts to HO3 but due to slightly less Green Belt release new residents could be in closer proximity to education opportunities, although there is a low probability of this option being achievable. HO3RA1 & HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3 → new residents may have slightly more limited access to education opportunities but development could facilitate the provision of new or expanded services in these locations to a greater extent than HO3. HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → residents likely to have excellent access to education opportunities. HO3RA3 & HO3RA4 → more limited quantity of new development → uncertain whether they would facilitate the provision of new education opportunities to the same extent as other options. HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → highest risk of new residents having to travel relatively far to access some education opportunities, but option could facilitate the provision of new services at LSCs & LGCs.
		HO3RA1	+	Bradford district	P/I	LT	M	
		HO3RA2	+	Bradford district	P/I	LT	M	
		HO3RA3	+	Bradford district	P/I	LT	M	
		HO3RA4	+	Bradford district	P/I	LT	M	
		HO3RA5	+	Bradford district	P/I	LT	L	
		HO3RA6	+	Bradford district	P/I	LT	M	
18. Employment		HO3	++	Bradford district	P/I	LT	M	HO3 → majority of development directed towards Regional City & Principal Towns → new residents likely to have excellent access to diverse range of high-quality employment opportunities. HO3RA5 would have largely similar impacts to HO3 but due to slightly less Green Belt release new residents could be in closer proximity to employment opportunities, although there is a low probability of this option being achievable. HO3RA1 & HO3RA2 → slightly more development directed towards smaller and more rural settlements than HO3 → new residents may have slightly more limited access to employment opportunities. HO3RA3 & HO3RA4 → majority of development directed towards Regional City & Principal Towns + no Green Belt development → residents likely to have excellent access to employment opportunities. However, unlikely that these options could accommodate enough new development to satisfy employment requirements. HO6 → more development directed towards smaller and more rural settlements than all other options, likely with significant Green Belt release → residents likely to have limited access to employment opportunities with restricted sustainable transport options.
		HO3RA1	+	Bradford district	P/I	LT	M	
		HO3RA2	+	Bradford district	P/I	LT	M	
		HO3RA3	--	Bradford district	P/I	LT	M	
		HO3RA4	--	Bradford district	P/I	LT	M	
		HO3RA5	++	Bradford district	P/I	LT	L	
		HO3RA6	-	Bradford district	P/I	LT	M	
19. Economy		HO3	++	Bradford district	P/I	LT	M	HO3, HO3RA1, HO3RA2 & HO3RA5 → likely to facilitate economic regeneration of areas throughout the City as well as different Principal Towns whilst helping to enhance the economic viability of LGCs and LSCs. HO3RA3 & HO3RA4 → could risk failing to accommodate a level of employment and economic development that regenerates local economies or enhances the viability of smaller settlements. HO3RA6 → would be likely to help lead to significant economic development in smaller and more rural settlements and thereby majorly enhance their viability going forwards. However, businesses in these locations may find it more difficult to compete and the more limited development in the City and Principal Towns could limit the regenerative impact of the CSPR on Bradford's economy and entrepreneurship.
		HO3RA1	+	Bradford district	P/I	LT	M	
		HO3RA2	+	Bradford district	P/I	LT	M	
		HO3RA3	--	Bradford district	P/I	LT	M	
		HO3RA4	--	Bradford district	P/I	LT	M	
		HO3RA5	++	Bradford district	P/I	LT	L	
	HO3RA6	-	Bradford district	P/I	LT	M		

Summary of, and assumptions in the assessment of, **Planning for People: Housing Policies HO2 & HO4 – HO7**

**Policy HO2: Strategic Sources of Housing Supply** is under review. The policy has been updated in order to bring it in line with the revised strategic priorities of the Plan. The Council consider that an alternative to this (i.e. an alternative that would not align with the priorities of the Plan) would not be reasonable. The proposed policy would determine how the housing requirements set out in HO1 can be met. The policy also sets out the areas for which specific area-based initiatives will be prepared to help achieve the supply targets. HO2 would be expected to help ensure that future development in Bradford satisfies the housing requirements. The assessment therefore assumes that the sustainability impacts associated with the construction and occupation of new homes are, in part, linked with this policy.

**Policy HO4: Managing Housing Delivery** is under review. The Council's preferred option would seek to ensure there is a managed and phased release of housing delivery to ensure sustainable housing growth. The policy would ensure that the release of land within the local plan will be managed and phased where appropriate. The policy determines the principles against which detailed proposals for allocations would be decided. The policy would be highly likely to help ensure that targets associated with housing mix, PDL and urban regeneration can be achieved. The policy would seek to ensure that the scale and timing of development is coordinated with the provision of new infrastructure as well as a safe and healthy environment. HO4 would be expected to make a major contribution towards ensuring that local housing requirements are satisfied. The assessment therefore assumes that the sustainability impacts associated with the construction and occupation of new homes are, in part, linked with this policy.

- **Policy HO4 Reasonable Alternative 1 (HO4RA1):** The first reasonable alternative identified by the Council was to delete the policy due to there being no requirement in the NPPF that requires the phasing of housing delivery. The Council note that they would still need to ensure the delivery of housing in a sustainable manner, therefore, there is some uncertainty of housing would be delivered, it is considered to be likely that HO4RA1 would lead to mostly similar impacts as HO4 but of a slightly lower magnitude and with less certainty. This alternative may make it difficult to manage the sustainable release of housing developments.
- **Policy HO4 Reasonable Alternative 2 (HO4RA2):** The second reasonable alternative identified by the Council was to reduce the scale of the policy and focus on delivering developments on PDL first. This approach would be likely to lack a comprehensive overview; however, the approach would be expected to lead to similar impacts as HO4 but with slightly less certainty.

**Policy HO5: Density of Housing Schemes** is under review. The Council's preferred option would seek to ensure that developers make the best and most effective use of land to ensure sustainable housing growth. The policy would require housing proposals to have a well-designed layout which reflects the nature of the site, its surroundings and accounts for the type and size of housing needed in the area. The policy would set out that the minimum net housing density would be 35 dwellings per hectare, which would increase to 50 dwellings per hectare in areas that are well served by public transport and amenities. Housing in locations that would be close to the City Centre, Principal Towns and locations close to the railways station would have significantly higher densities. The policy would be highly likely to help ensure the delivery of Bradford's housing requirements and ensure the most efficient use of allocate housing land.

- **Policy HO5 Reasonable Alternative 1 (HO5RA1):** The reasonable alternative identified by the Council was to reduce the minimum net housing density to 30 dwellings per hectare. The Council note that lower density schemes may result in less efficient use of land which may result in the need for future additional land releases. It is considered to be likely that HO5RA1 would lead to mostly similar impacts as HO5 but of a slightly lower magnitude and with less certainty.

**Policy HO6: Maximising the Use of Previously Developed Land (PDL)** is under review. The proposed policy would give priority to the development of PDL and buildings to ensure sustainable housing growth. The policy would ensure the maximum re-use of previously developed land that would be consistent with: the deliverable and developable land supply; the need to maintain a 5 year land supply of deliverable sites; the need to coordinate development with infrastructure provision; and, the need to maintain delivery of the scale and type of homes required throughout the plan period. The policy would seek to ensure that, District wide, at least 50% of total new housing developments over

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the plan period will be on PDL. The policy would set out targets for housing development on PDL in the Regional City of Bradford (55%), the Principal Towns (35%), the Local Growth Centres (20%) and the Local Service Centres (25%). The policy would ensure performance against these targets would be monitored and action would be taken if performance were to slip outside of the defined acceptable ranges. The policy would be highly likely to help ensure the sustainable delivery of Bradford’s housing requirements and ensure the most efficient use of existing developed land.

**Policy HO7: Housing Site Allocation Principles** is not under review. The proposed policy would set out the principles for the allocation of housing sites to ensure the sustainable delivery of housing growth. The policy would ensure the allocation of sufficient deliverable and developable sites, to meet the targets set out in HO1 and HO3. The policy would prioritise site allocations that would contribute to regeneration of the plan area and developments that would aid in remedying identified local infrastructure and services deficiencies (e.g. open space and education). The policy would also ensure the maximisation of developments on PDL and the minimisation of development on Green Belt land. The principles within the policy would require housing allocations to maximise positive environmental benefits through the prioritisation of sustainably located sites that would support significant environmental improvements; enhancements to biodiversity or contribute to no net loss; opportunities for decentralised and renewable/ low carbon energies; and, opportunities to create and enhance green infrastructure. The principles within the policy would also require housing allocations to minimise adverse environmental impacts, by where every possible: selecting sites with accessibility to a range of services and facilities that would reduce the need for travel; selecting sites with accessibility to a range of public transport services; avoiding the development of sites that would result in fragmentation or isolation of natural habitats; ensuring sites relate well to the local form and character of the settlement; minimising loss of trees and woodland; avoiding sites or locations which pose unacceptable risks to health and safety; and, applying a sequential flood risk approach to direct developments to the areas of lowest flood risk. The policy would be highly likely to help ensure the sustainable delivery of Bradford’s housing requirements whilst ensuring the most efficient use of land. The policy would also be likely to reduce the environmental footprint of new housing developments.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		HO2	-	Bradford District	P/I	LT	M	All options and alternatives → support the delivery of housing growth → increase in residential energy consumption + increase in residents’ use of cars → significant increase in GHG emissions. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4. HO7→ seek to locate sites with accessibility to services, facilities and public transport + support site opportunities for decentralised and renewable/ low carbon energies → reduce need for car travel + increase renewable energy generation → reduce residential energy consumption + reduce potential GHG emissions.  <b>Recommendations: None.</b>
		HO4	-	Bradford District	P/I	LT	M	
		HO4RA1	-	Bradford District	P/I	LT	L	
		HO4RA2	-	Bradford District	P/I	LT	L	
		HO5	-	Bradford District	P/I	LT	M	
		HO5RA1	-	Bradford District	P/I	LT	M	
		HO6	-	Bradford District	P/I	LT	M	
2. Waste		HO2	-	Bradford District	T/R	LT	M	All options and alternatives → support the delivery of housing growth → significant construction + increase in residents → increase in construction & residential waste. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4. HO5RA1 → potential to result in greater construction waste if additional housing sites would need to be sourced.  <b>Recommendations: None.</b>
		HO4	-	Bradford District	T/R	LT	M	
		HO4RA1	-	Bradford District	T/R	LT	L	
		HO4RA2	-	Bradford District	T/R	LT	L	
		HO5	-	Bradford District	T/R	LT	M	
		HO5RA1	-	Bradford District	T/R	LT	L	
		HO6	-	Bradford District	T/R	LT	M	
HO7	-	Bradford District	T/R	LT	M			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
3. Land & buildings		HO2	-	Bradford District	T/I	LT	M	All options and alternatives → support the delivery of significant number of new homes → significant quantity of land to be developed on, with up to 50% of the District wide allocation on previously undeveloped land. HO4RA2 → prioritise developments on PDL in the phasing of development. HO5RA1 → potential to result in a need for additional housing sites → potentially greater greenfield loss. HO6 → ensure at least 50% of the District wide housing allocation is on previously developed land. HO7 → support the reclamation of derelict land. <b>Recommendations:</b> HO6 could aim for a more ambitious target for housing allocation on previously developed land.
		HO4	-	Bradford District	T/R	LT	M	
		HO4RA1	-	Bradford District	T/R	LT	L	
		HO4RA2	+/-	Bradford District	T/R	LT	L	
		HO5	-	Bradford District	T/R	LT	M	
		HO5RA1	-	Bradford District	T/R	LT	L	
		HO6	+/-	Bradford District	T/R	LT	L	
		HO7	+/-	Bradford District	T/R	LT	L	
4. Climate change vulnerability		HO2	-	Bradford District	T/R	LT	L	All options and alternatives → support significant residential development → likely loss of greenfield → increase in impermeable surfaces could alter flood risk. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4. HO5RA1 → potential to result in the requirement of additional housing sites due to the lower density of housing → greater areas of impermeable surfaces and loss of greenfield land could increase flood risk. HO7 → apply a sequential flood risk approach to direct developments to the areas of lowest flood risk + support opportunities for integrating GI into developments → reduce potential GHG emissions. <b>Recommendations:</b> None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.
		HO4	-	Bradford District	T/R	LT	L	
		HO4RA1	-	Bradford District	T/R	LT	L	
		HO4RA2	-	Bradford District	T/R	LT	L	
		HO5	-	Bradford District	T/R	LT	L	
		HO5RA1	-	Bradford District	T/R	LT	L	
		HO6	-	Bradford District	T/R	LT	L	
HO7	+/-	Bradford District	T/R	LT	L			
5. Water resources		HO2	-	Bradford District	T/R	LT	L	All options and alternatives → significant residential development → increase in residential water consumption. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4. All options and alternatives → significant residential development → risk of pollution or contamination of natural waterbodies, particularly due to runoff, during construction & operation. <b>Recommendations:</b> None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.
		HO4	-	Bradford District	T/R	LT	L	
		HO4RA1	-	Bradford District	T/R	LT	L	
		HO4RA2	-	Bradford District	T/R	LT	L	
		HO5	-	Bradford District	T/R	LT	L	
		HO5RA1	-	Bradford District	T/R	LT	L	
		HO6	-	Bradford District	T/R	LT	L	
HO7	-	Bradford District	T/R	LT	L			
6. Biodiversity & geodiversity		HO2	-	Bradford District	T/R	LT	L	All options and alternatives → support significant residential development → potential increase in public access associated disturbances at sensitive habitats + potential loss of greenfield → direct loss of wildlife & supporting habitat + impacts on ecological connectivity. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4. HO5RA1 → potential to result in the additional loss of greenfield sites due to the lower density of housing. HO7 → seek to achieve biodiversity enhancements and no net loss + include opportunities for GI + avoid habitat fragmentation and isolation → seek to reduce impact upon biodiversity + enhance biodiversity and increase ecological connectivity. <b>Recommendations:</b> None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.
		HO4	-	Bradford District	T/R	LT	L	
		HO4RA1	-	Bradford District	T/R	LT	L	
		HO4RA2	-	Bradford District	T/R	LT	L	
		HO5	-	Bradford District	T/R	LT	L	
		HO5RA1	-	Bradford District	T/R	LT	L	
		HO6	-	Bradford District	T/R	LT	L	
HO7	+/-	Bradford District	T/R	LT	L			
		HO2	+/-	Bradford District	T/R	LT	L	All options and alternatives → support significant residential development → loss of open spaces → potential negative impacts on natural landscape character + potential negative impacts on setting of heritage assets &
		HO4	+/-	Bradford District	T/R	LT	L	

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7. Landscape & townscape		HO4RA1	+/-	Bradford District	T/R	LT	L	historic areas.
		HO4RA2	+/-	Bradford District	T/R	LT	L	All options and alternatives → support significant residential development → redevelopment of brownfield sites → enhancement to local character + enhancement to setting of heritage assets & historic areas
		HO5	+/-	Bradford District	T/R	LT	L	
		HO5RA1	+/-	Bradford District	T/R	LT	L	HO5RA1 → potential to result in the requirement of additional housing sites due to the lower density of housing → greater areas of greenfield land loss → greater potential impact on townscape and landscape.
		HO6	+/-	Bradford District	T/R	LT	L	
		HO7	+/-	Bradford District	T/R	LT	L	HO6 → ensure at least 50% of the District wide housing allocation is on previously developed land.
8. Cultural heritage		HO2	+/-	Bradford District	T/R	LT	L	
		HO4	+/-	Bradford District	T/R	LT	L	Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4.
		HO4RA1	+/-	Bradford District	T/R	LT	L	
		HO4RA2	+/-	Bradford District	T/R	LT	L	<b>Recommendations: None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.</b>
		HO5	+/-	Bradford District	T/R	LT	L	
		HO5RA1	+/-	Bradford District	T/R	LT	L	
		HO6	+/-	Bradford District	T/R	LT	L	
9. Air quality		HO2	-	Bradford District	T/R	LT	M	All options and alternatives → significant residential development → increase in residential energy consumption + increase in residents' use of cars → increase in air pollution.
		HO4	-	Bradford District	T/R	LT	M	
		HO4RA1	-	Bradford District	T/R	LT	L	Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4.
		HO4RA2	-	Bradford District	T/R	LT	L	
		HO5	-	Bradford District	T/R	LT	M	HO7 → seek to locate sites with accessibility to services, facilities and public transport + support site opportunities for decentralised and renewable/ low carbon energies → reduce potential air pollution.
		HO5RA1	-	Bradford District	T/R	LT	L	
		HO6	-	Bradford District	T/R	LT	M	All options and alternatives → significant residential development → potential net increase in total number of local people using cars for regular travel purposes → potential negative impact on congestion.
HO7	+/-	Bradford District	T/R	LT	L			
10. Transport		HO2	-	Bradford District	T/R	LT	M	All options and alternatives → significant residential development → increase in residents → increase in pressure on capacity of public transport system & walking and cycling routes.
		HO4	-	Bradford District	T/R	LT	M	
		HO4RA1	-	Bradford District	T/R	LT	L	HO7 → seek to select sites that are accessible to quality public transport services + ensures infrastructure in place prior to development.
		HO4RA2	-	Bradford District	T/R	LT	M	
		HO5	-	Bradford District	T/R	LT	M	<b>Recommendations: None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.</b>
		HO5RA1	-	Bradford District	T/R	LT	L	
		HO6	-	Bradford District	T/R	LT	M	
HO7	+/-	Bradford District	T/R	LT	L			
11. Housing		HO2	+++	Bradford District	T/R	LT	H	All options and alternatives → support, encourage and help to make more likely significant residential development that satisfies housing needs across the District for Bradford's varied and growing population.
		HO4	+++	Bradford District	T/R	LT	H	
		HO4RA1	+++	Bradford District	T/R	LT	L	
		HO4RA2	+++	Bradford District	T/R	LT	L	HO4RA1 → support the delivery of housing growth in the Region → uncertainty of phasing and when the housing would be delivered. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4.
		HO5	+++	Bradford District	T/R	LT	H	

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		HO5RA1	++	Bradford District	T/R	LT	M	<b>Recommendations:</b> HO5 should include guidelines for the maximum density of dwellings per hectare in order to ensure housing developments aren't overcrowded.
		HO6	++	Bradford District	T/R	LT	H	
		HO7	++	Bradford District	T/R	LT	H	
12. Range of accessible services		HO2	+/-	Bradford District	T/R	LT	L	All options and alternatives → significant residential development → new residents able to access services and cultural assets in Bradford → increase in demand could validate the provision of new services & assets.
		HO4	+/-	Bradford District	T/R	LT	L	
		HO4RA1	+/-	Bradford District	T/R	LT	L	All options and alternatives → significant residential development → significant number of new homes → growth in residents → additional pressure potentially placed on the capacity of existing services.
		HO4RA2	+/-	Bradford District	T/R	LT	L	
		HO5	+/-	Bradford District	T/R	LT	L	
		HO5RA1	+/-	Bradford District	T/R	LT	L	
		HO6	+/-	Bradford District	T/R	LT	L	
HO7	+/-	Bradford District	T/R	LT	L	All options and alternatives → significant residential development → potential risk of altering the balance or cohesion of local communities.		
13. Social Cohesion		HO2	+/-	Bradford District	T/R	LT	L	HO7 → prioritise developments that would help to remedy existing infrastructure and services deficiencies + select sites with accessibility to a range of services, facilities and public transport options.  <b>Recommendations:</b> None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.
		HO4	+/-	Bradford District	T/R	LT	L	
		HO4RA1	+/-	Bradford District	T/R	LT	L	
		HO4RA2	+/-	Bradford District	T/R	LT	L	
		HO5	+/-	Bradford District	T/R	LT	L	
		HO5RA1	+/-	Bradford District	T/R	LT	L	
		HO6	+/-	Bradford District	T/R	LT	L	
14. Culture & leisure		HO2	+/-	Bradford District	T/R	LT	L	
		HO4	+/-	Bradford District	T/R	LT	L	
		HO4RA1	+/-	Bradford District	T/R	LT	L	
		HO4RA2	+/-	Bradford District	T/R	LT	L	
		HO5	+/-	Bradford District	T/R	LT	L	
		HO5RA1	+/-	Bradford District	T/R	LT	L	
		HO6	+/-	Bradford District	T/R	LT	L	
15. Safe & secure		HO2	+/-	Bradford District	T/R	LT	L	All options and alternatives → significant residential development → increase in number of residents → increase in potential victims of crime + developments that attract crime.
		HO4	+/-	Bradford District	T/R	LT	L	
		HO4RA1	+/-	Bradford District	T/R	LT	L	All options and alternatives → significant residential development → safe accommodation for local people. HO4 & HO7 → require developments to be safe and health environments. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4.
		HO4RA2	+/-	Bradford District	T/R	LT	L	
		HO5	+/-	Bradford District	T/R	LT	L	
		HO5RA1	+/-	Bradford District	T/R	LT	L	<b>Recommendations:</b> None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.
		HO6	+/-	Bradford District	T/R	LT	L	
HO7	+/-	Bradford District	T/R	LT	L			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
16. Health		HO2	?	Bradford District	T/R	LT	L	All options → support the delivery of housing growth → significant number of new homes → enable healthy lifestyles at home + provide good access to health facilities such as hospitals & GP surgeries. HO2, HO4, HO5, HO6 & HO7 → significant housing growth → uncertain if this would place the capacity of existing services under excessive pressure or if it would make the delivery of improved/new services more viable. HO7 → site allocations to have good access to services and facilities including to health care services HO7 → support the provision on GI + prioritise sites that would help to remedy local infrastructure and service deficiencies (e.g. open space) → encourage uptake of physical activities → benefits to mental physical wellbeing. <b>Recommendations: None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.</b>
		HO4	?	Bradford District	T/R	LT	L	
		HO4RA1	?	Bradford District	T/R	LT	L	
		HO4RA2	?	Bradford District	T/R	LT	L	
		HO5	?	Bradford District	T/R	LT	L	
		HO5RA1	?	Bradford District	T/R	LT	L	
		HO6	?	Bradford District	T/R	LT	L	
17. Education		HO2	?	Bradford District	T/R	LT	L	All options and alternatives → significant residential development → increased pressure on capacity of existing education facilities → uncertain if growth of residential development would place the existing services under excessive pressure or if it would make the delivery of improved/new services more viable. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4. HO7 → prioritise sites that would help to remedy local infrastructure and service deficiencies (e.g. education) → support the development of new educational facilities. <b>Recommendations: None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.</b>
		HO4	?	Bradford District	T/R	LT	L	
		HO4RA1	?	Bradford District	T/R	LT	L	
		HO4RA2	?	Bradford District	T/R	LT	L	
		HO5	?	Bradford District	T/R	LT	L	
		HO5RA1	?	Bradford District	T/R	LT	L	
		HO6	?	Bradford District	T/R	LT	L	
18. Employment		HO2	++	Bradford District	T/R	LT	M	All options and alternatives → significant residential development → significant number of new homes → new residents with good access to Bradford's employment market + larger pool of potential employees for local businesses to employ from. HO2, HO4RA1, HO4RA2, HO5, HO5RA1, HO6, HO7 → support the delivery of housing growth → construction of new homes → boost to housing market in Bradford → major boost to local economy + employment. HO2, HO4RA1, HO4RA2, HO5, HO5RA1, HO6, HO7 → support the delivery of housing growth → additional homes and residents → increase in local population of working-age → boost to local businesses. Impacts of HO4RA1 & HO4RA2 likely to be of similar magnitude but lower probability than HO4. <b>Recommendations: None. It is considered that these policies are not an appropriate section of the CSPR to incorporate mitigation for this SA Objective.</b>
		HO4	++	Bradford District	T/R	LT	M	
		HO4RA1	++	Bradford District	T/R	LT	L	
		HO4RA2	++	Bradford District	T/R	LT	L	
		HO5	++	Bradford District	T/R	LT	M	
		HO5RA1	++	Bradford District	T/R	LT	M	
		HO6	++	Bradford District	T/R	LT	M	
19. Economy		HO2	+	Bradford District	T/R	LT	M	
		HO4	+	Bradford District	T/R	LT	M	
		HO4RA1	+	Bradford District	T/R	LT	L	
		HO4RA2	+	Bradford District	T/R	LT	L	
		HO5	+	Bradford District	T/R	LT	M	
		HO5RA1	+	Bradford District	T/R	LT	M	
		HO6	+	Bradford District	T/R	LT	M	
HO7	+	Bradford District	T/R	LT	M			

Summary of, and assumptions in the assessment of, **Planning for People: Housing Policies HO8 – HO12**

**Policy HO8: Housing Mix** is under review. The preferred option would seek to ensure that a mix and balance of housing would be provided to meet the needs of the District's growing population. The policy would require all residential sites, over 10 units, to incorporate a mix of housing types, sizes, prices and tenures. The mix of housing would be informed by market demand, local need and the location and nature of the sites' surroundings. Specific guidance on the housing mix for an area would be set out in the Site Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans. The policy would also set out the strategic priorities for delivering a mix of housing, which are as follows: delivering more family friendly housing; delivering sufficient affordable housing in line with HO11 and meeting the needs of first time buyers and those on lower incomes; increasing the supply of larger homes, particularly in areas suffering from high levels of overcrowding; increasing the supply of accessible housing; increasing the supply of high quality flats, particularly in the city and town centres and accessible locations; and, supporting the provision of specialist accommodation for older people to meet identified needs. The policy would also require the council to support proposals for custom and self-build housing to meet identified local demand. The policy would be highly likely to ensure that the varied housing needs of the diverse community in Bradford are met and so a major positive impact on the housing SA Objective would be likely. Positive impacts on SA Objectives are likely. The proposed housing mix would be likely to help ensure that communities are diverse and cohesive whilst reducing homelessness, poverty and deprivation and providing good and secure living conditions for local people to the benefit of their physical and mental wellbeing. It would help to increase and diversify the local pool of employees businesses can recruit from.

- **Policy HO8 Reasonable Alternative 1 (HO8RA1):** The first alternative would set out specific percentages for the need, type and location of specialist housing for older people on a District or sub area basis. It is likely that this alternative would have largely similar impacts as the preferred option but provide greater certainty in meeting the required provision of specialist housing.
- **Policy HO8 Reasonable Alternative 2 (HO8RA2):** The second alternative would require a proportion of larger sites to include plots for custom self-build plots. It is likely that this alternative would have largely similar impacts as the preferred option but could potentially provide greater certainty that the diverse housing needs are met.

**Policy HO9: Housing Quality** is under review. The preferred option would seek to ensure that housing developments are of high quality and contribute to an inclusive built environment. The policy would support the provision of suitable housing that would provide genuine choice for the District's diverse population new residential developments and encourage all new housing developments to achieve high sustainable design and construction standards and to meet appropriate accessibility standards. The policy would also require new homes be well laid out, well-lit and to meet the minimum internal requirements prescribed in the Nationally Described Space Standard (NDSS). The policy also requires the provision of well designed, convenient waste solutions that support recycling for all new developments. Specific non-strategic policies and guidance on housing quality and design on an area or site basis will be set out as necessary in the Site Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs, The Homes and Neighbourhoods Design Guide SPD and Neighbourhood Plans. HO9 would be expected to help ensure that the varied housing needs of the diverse local population are met and that people can live healthy and high-quality lives at home. Positive impacts on SA Objectives related to housing, safety and community are therefore likely.

- **Policy HO9 Reasonable Alternative 1 (HO9RA1):** The first alternative would maintain current policy approach of requiring a proportion of homes on larger site to be accessible but not setting out the detailed requirement in relation to optional technical standards. The alternative would be likely to have largely similar impacts as the preferred option but have less certainty and slightly less positive scoring due to lower proportion and less detailed standards for the provision of accessible homes.
- **Policy HO9 Reasonable Alternative 2 (HO9RA2):** The second alternative would not require the inclusion of the optional technical standards for housing. The alternative would be likely to have largely similar impacts as the preferred option but have less certainty and slightly less positive scoring as the policy would not include the higher optional technical standards for acceptable and adaptable housing which exceed that minimum standards required by the Building Regulations.

**Policy HO10: Overcrowding and Empty Homes** is not under review. The proposed policy would seek to make the best use and improve the quality of the existing housing

stock in order to address the District's housing problems of overcrowding and empty homes. The Council's policy interventions and investment priorities would be set out within the Council's District Housing Strategy, the Council's Empty Homes Delivery Plan, its Neighbourhood Development Frameworks, Neighbourhood Action Plans and within a Householder SPD.

**Policy HO11: Affordable Housing** is under review. The preferred option would seek to ensure a sufficient supply of good quality, affordable housing is delivered to meet the District's affordable housing needs. The policy would require major residential developments to meet the identified local affordable housing needs, which are as follows: 30% in Wharfedale; 20% in towns, suburbs and villages; and, 15% in inner Bradford and Keighley. The affordable housing would be provided on-site and be indistinguishable from and well-integrated with market housing, unless off-site provision or a financial contribution in lieu of on-site provision is robustly justified. The policy would seek to support the council in providing a mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability. Affordable housing contributions would be required on all development of 0.5 hectare or 10 or more units, however if an applicant can provide robust, up to date and verifiable evidence that finds the provision of affordable targets unviable, the exact amount of affordable housing, or a financial contribution to be delivered, will be determined by economic viability having regard to individual sites and market conditions. The policy also would set out the requirements for rural exception sites. The provision of affordable housing can help to ensure people are able to move for work and are not constrained by high housing prices. They also help to increase and diversify the local pool of employees businesses can recruit from. Affordable housing helps to reduce homelessness, poverty and deprivation whilst also providing good and secure living conditions for local people to the benefit of their physical and mental wellbeing.

- **Policy HO11 Reasonable Alternative 1 (HO11RA1):** the first alternative would require affordable housing targets below the current policy. It is likely that this alternative would perform less positively and with less certainty than the preferred option as it would be unlikely to be in line with the revised NPPF policy and evidenced need of affordable housing in the District.
- **Policy HO11 Reasonable Alternative 2 (HO11RA2):** the second alternative would set out an alternative approach to the tenure split and types of affordable housing required. Due to the lack of detail it is likely that this alternative would perform less positively with greater levels of uncertainty than the preferred option.

**Policy HO12: Provision of Sites for Gypsies, Travellers and Travelling Show people**

is under review. The preferred option would be to ensure that policies and site allocations deliver 10 pitches for the Gypsy and Traveller community as well as 5 pitches for transit accommodation to address short-term needs. This would be considered to be enough pitches to accommodate the requirements of the Gypsy and Traveller community in Bradford over the Plan period. These sites would be in sustainable and accessible locations, assessed against criteria including safe and appropriate highways access; utilities and infrastructure availability; access to services, amenities and public transport; environmental impacts; landscape; and flood risk. Rural exception sites would also be protected.

- **Policy HO12 Reasonable Alternative 1 (HO12RA1):** The first reasonable alternative considered by the Council was to deliver enough pitches to satisfy the cultural need, rather than the assessed need, which would be 17 new pitches. This option would be likely to significantly benefit the Gypsy and Traveller community, with their sites needs definitely being satisfied. The greater uptake of sites could potentially pose a very minor increase risk of harm to the natural environment where they are located in-comparison with the preferred option.
- **Policy HO12 Reasonable Alternative 2 (HO12RA2):** The second reasonable alternative considered by the Council was to target no new pitches as the evidence suggests that the turnover of sites would satisfy the need. Under this approach there would potentially be less certainty of the community's needs being satisfied.

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
1. Energy & GHGs		HO8	○	Bradford District	n/a	n/a	H	All policies → no discernible impact → policies relate to the type and quality, not the provision of housing which is covered under policies HO1-HO7  <b>Recommendations: None.</b>
		HO8RA1	○	Bradford District	n/a	n/a	H	
		HO8RA2	○	Bradford District	n/a	n/a	H	
		HO9	○	Bradford District	n/a	n/a	H	
		HO9RA1	○	Bradford District	n/a	n/a	H	
		HO9RA2	○	Bradford District	n/a	n/a	H	
		HO10	○	Bradford District	n/a	n/a	H	
		HO11	○	Bradford District	n/a	n/a	H	
		HO11RA1	○	Bradford District	n/a	n/a	H	
		HO11RA2	○	Bradford District	n/a	n/a	H	
		HO12	○	Bradford District	n/a	n/a	H	
		HO12RA1	○	Bradford District	n/a	n/a	H	
HO12RA2	○	Bradford District	n/a	n/a	H			
2. Waste		HO8	○	Bradford District	n/a	n/a	H	HO9 & its alternatives → development required to incorporate appropriate waste management spaces. HO9 likely to have impact of slightly greater magnitude with more certainty than its alternatives.  HO10 → make use of existing empty homes to satisfy housing needs → efficient management of building resources → reduced waste from construction phase.  HO8 & alternatives, HO9RA1, HO9RA2, HO11 & alternatives and HO12 & alternatives → no discernible impact.  <b>Recommendations: None.</b>
		HO8RA1	○	Bradford District	n/a	n/a	H	
		HO8RA2	○	Bradford District	n/a	n/a	H	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	H	
		HO11	○	Bradford District	n/a	n/a	H	
		HO11RA1	○	Bradford District	n/a	n/a	H	
		HO11RA2	○	Bradford District	n/a	n/a	H	
		HO12	○	Bradford District	n/a	n/a	H	
		HO12RA1	○	Bradford District	n/a	n/a	H	
HO12RA2	○	Bradford District	n/a	n/a	H			
3. Land & buildings		HO8	○	Bradford District	n/a	n/a	H	HO10 → make use of existing empty homes to satisfy housing needs → efficient management of building resources.  All other policies → no discernible impact.  <b>Recommendations: None.</b>
		HO8RA1	○	Bradford District	n/a	n/a	H	
		HO8RA2	○	Bradford District	n/a	n/a	H	
		HO9	○	Bradford District	n/a	n/a	H	
		HO9RA1	○	Bradford District	n/a	n/a	H	
		HO9RA2	○	Bradford District	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		HO10	+	Bradford District	T/R	LT	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	
		HO12RA1	O	Bradford District	n/a	n/a	H	
		HO12RA2	O	Bradford District	n/a	n/a	H	
4. Climate change vulnerability		HO8	O	Bradford District	n/a	n/a	H	All policies → no discernible impact.  <b>Recommendations: None.</b>
		HO8RA1	O	Bradford District	n/a	n/a	H	
		HO8RA2	O	Bradford District	n/a	n/a	H	
		HO9	O	Bradford District	n/a	n/a	H	
		HO9RA1	O	Bradford District	n/a	n/a	H	
		HO9RA2	O	Bradford District	n/a	n/a	H	
		HO10	O	Bradford District	n/a	n/a	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	
		HO12RA1	O	Bradford District	n/a	n/a	H	
		HO12RA2	O	Bradford District	n/a	n/a	H	
5. Water resources		HO8	O	Bradford District	n/a	n/a	H	All policies → no discernible impact.  <b>Recommendations: None.</b>
		HO8RA1	O	Bradford District	n/a	n/a	H	
		HO8RA2	O	Bradford District	n/a	n/a	H	
		HO9	O	Bradford District	n/a	n/a	H	
		HO9RA1	O	Bradford District	n/a	n/a	H	
		HO9RA2	O	Bradford District	n/a	n/a	H	
		HO10	O	Bradford District	n/a	n/a	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	
		HO12RA1	O	Bradford District	n/a	n/a	H	
		HO12RA2	O	Bradford District	n/a	n/a	H	
		HO8	O	Bradford District	n/a	n/a	H	All policies → no discernible impact.
		HO8RA1	O	Bradford District	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
6. Biodiversity & geodiversity		HO8RA2	O	Bradford District	n/a	n/a	H	<i>Recommendations: None.</i>
		HO9	O	Bradford District	n/a	n/a	H	
		HO9RA1	O	Bradford District	n/a	n/a	H	
		HO9RA2	O	Bradford District	n/a	n/a	H	
		HO10	O	Bradford District	n/a	n/a	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	
		HO12RA1	O	Bradford District	n/a	n/a	H	
		HO12RA2	O	Bradford District	n/a	n/a	H	
7. Landscape & townscape		HO8	+	Bradford District	T/R	LT	L	HO8 & HO9 and their alternatives → help to ensure that new housing is in-keeping with the existing build form in the surrounding area → help to protect local character & setting. HO8RA1 & HO8RA2 potentially provide more certainty over positive impact taking place. HO9 likely to have impact of slightly greater magnitude with more certainty than its alternatives.  All other policies → no discernible impacts. <i>Recommendations: None.</i>
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	L	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	O	Bradford District	n/a	n/a	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	
		HO12RA1	O	Bradford District	n/a	n/a	H	
	HO12RA2	O	Bradford District	n/a	n/a	H		
8. Cultural heritage		HO8	+	Bradford District	T/R	LT	L	
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	L	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	O	Bradford District	n/a	n/a	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
9. Air quality		HO12RA1	O	Bradford District	n/a	n/a	H	<p>All policies → no discernible impact.</p> <p><b>Recommendations: None.</b></p>
		HO12RA2	O	Bradford District	n/a	n/a	H	
		HO8	O	Bradford District	n/a	n/a	H	
		HO8RA1	O	Bradford District	n/a	n/a	H	
		HO8RA2	O	Bradford District	n/a	n/a	H	
		HO9	O	Bradford District	n/a	n/a	H	
		HO9RA1	O	Bradford District	n/a	n/a	H	
		HO9RA2	O	Bradford District	n/a	n/a	H	
		HO10	O	Bradford District	n/a	n/a	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	
		HO12RA1	O	Bradford District	n/a	n/a	H	
HO12RA2	O	Bradford District	n/a	n/a	H			
10. Transport		HO8	O	Bradford District	n/a	n/a	H	<p>All policies → no discernible impact.</p> <p><b>Recommendations: None.</b></p>
		HO8RA1	O	Bradford District	n/a	n/a	H	
		HO8RA2	O	Bradford District	n/a	n/a	H	
		HO9	O	Bradford District	n/a	n/a	H	
		HO9RA1	O	Bradford District	n/a	n/a	H	
		HO9RA2	O	Bradford District	n/a	n/a	H	
		HO10	O	Bradford District	n/a	n/a	H	
		HO11	O	Bradford District	n/a	n/a	H	
		HO11RA1	O	Bradford District	n/a	n/a	H	
		HO11RA2	O	Bradford District	n/a	n/a	H	
		HO12	O	Bradford District	n/a	n/a	H	
		HO12RA1	O	Bradford District	n/a	n/a	H	
		HO12RA2	O	Bradford District	n/a	n/a	H	
		11. Housing		HO8	++	Bradford District	T/R	
HO8RA1	++			Bradford District	T/R	LT	H	
HO8RA2	++			Bradford District	T/R	LT	H	
HO9	++			Bradford District	T/R	LT	H	
HO9RA1	++			Bradford District	T/R	LT	H	
HO9RA2	++			Bradford District	T/R	LT	H	
HO10	++			Bradford District	T/R	LT	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		HO11	++	Bradford District	T/R	LT	H	<p>H10 → help to ensure a high-quality life at home for people in Bradford</p> <p>HO12 &amp; HO12RA1 likely provide greater certainty of satisfying needs than HO12RA2.</p> <p><b>Recommendations: None.</b></p>
		HO11RA1	++	Bradford District	T/R	LT	H	
		HO11RA2	++	Bradford District	T/R	LT	H	
		HO12	++	Bradford District	T/R	LT	H	
		HO12RA1	++	Bradford District	T/R	LT	M	
		HO12RA2	++	Bradford District	T/R	LT	L	
12. Range of accessible services		HO8	+	Bradford District	T/R	LT	M	<p>All policies → enable Bradford's diverse and growing population to live in locations within existing diverse communities &amp; with excellent access to services, amenities and facilities.</p> <p>HO9 &amp; its alternatives → homes of a high quality → contributes towards cohesive communities &amp; sustainable societies + space at home for socialisation.</p> <p><b>Recommendations: None.</b></p>
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	M	
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
		HO12RA1	+	Bradford District	T/R	LT	M	
HO12RA2	+	Bradford District	T/R	LT	L			
13. Social Cohesion		HO8	+	Bradford District	T/R	LT	M	
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	M	
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
		HO12RA1	+	Bradford District	T/R	LT	M	
HO12RA2	+	Bradford District	T/R	LT	L			
		HO8	+	Bradford District	T/R	LT	M	
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
14. Culture & leisure		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	M	
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
		HO12RA1	+	Bradford District	T/R	LT	M	
HO12RA2	+	Bradford District	T/R	LT	L			
15. Safe & secure		HO8	+	Bradford District	T/R	LT	M	All policies → help ensure that the diverse and growing population of Bradford are able to live in safe and high-quality homes. Likely reduction in homelessness, poverty and deprivation facilitates more safe & secure lifestyles for local people.  <b>Recommendations: None.</b>
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	M	
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
HO12RA1	+	Bradford District	T/R	LT	M			
HO12RA2	+	Bradford District	T/R	LT	L			
16. Health		HO8	+	Bradford District	T/R	LT	M	All policies → help ensure that the diverse and growing population of Bradford are able to live in secure and high-quality homes → reduction in homelessness, poverty and deprivation + people able to live healthy & active lifestyles at home → benefits to mental & physical wellbeing.  <b>Recommendations: None.</b>
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	M	
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
HO12RA1	+	Bradford District	T/R	LT	M			

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
17. Education		HO12RA2	+	Bradford District	T/R	LT	L	All policies → help ensure that the diverse and growing population of Bradford are able to live in secure & stable accommodation that provides good access to a range of education facilities in Bradford.  <i>Recommendations: None.</i>
		HO8	+	Bradford District	T/R	LT	M	
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	M	
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
		HO12RA1	+	Bradford District	T/R	LT	M	
		HO12RA2	+	Bradford District	T/R	LT	L	
18. Employment		HO8	+	Bradford District	T/R	LT	M	All policies → reduce homelessness, poverty & deprivation + help ensure that the diverse and growing population of Bradford are able to live in secure & stable accommodation that provides good access to employment opportunities in Bradford.  HO8, HO11 and their alternatives → help to ensure people are able to move for work and are not constrained by high housing prices.  HO8, HO11 and their alternatives → help to increase and diversify the local pool of employees businesses can recruit from.  <i>Recommendations: None.</i>
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
		HO10	+	Bradford District	T/R	LT	M	
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
		HO12RA1	+	Bradford District	T/R	LT	M	
	HO12RA2	+	Bradford District	T/R	LT	L		
19. Economy		HO8	+	Bradford District	T/R	LT	M	
		HO8RA1	+	Bradford District	T/R	LT	L	
		HO8RA2	+	Bradford District	T/R	LT	L	
		HO9	+	Bradford District	T/R	LT	M	
		HO9RA1	+	Bradford District	T/R	LT	L	
		HO9RA2	+	Bradford District	T/R	LT	L	
	HO10	+	Bradford District	T/R	LT	M		

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		HO11	+	Bradford District	T/R	LT	M	
		HO11RA1	+	Bradford District	T/R	LT	L	
		HO11RA2	+	Bradford District	T/R	LT	L	
		HO12	+	Bradford District	T/R	LT	H	
		HO12RA1	+	Bradford District	T/R	LT	M	
		HO12RA2	+	Bradford District	T/R	LT	L	

Summary of, and assumptions in the assessment of, **Planning for Places: Environment Policies EN1 – EN8**

**Policy EN1: Protection and improvements in the provision of Open Space and Recreational Facilities** is not under review. The proposed policy would seek to protect and improve open spaces and recreational facilities in the District. This includes ‘parks and gardens, natural and semi-natural greenspaces, green corridors, amenity and local greenspace, outdoor sports facilities, provision for children, allotments, civic spaces and also areas of water which offer opportunities for sport and recreation.’ The policy would also seek to facilitate council engagement with local communities to identify areas of Local Green Space. In addition to protecting these spaces from being lost to development, EN1 would require housing developments to provide new or improved open space, sports facilities or recreational spaces, either on or off site, and where a development would lead to the release of greenfield or greenbelt land; in addition, any identified recreational space/open space deficiency in the local area would need to be addressed. The policy would also require residential developments that increase pressure upon the South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC) to mitigate these effects through the provision or enhancements of an open space. The improvement of existing, and delivery of new, open spaces and recreational facilities would be highly likely to deliver a range of sustainability benefits to Bradford, including encouraging physical activity, providing benefits to mental wellbeing, enabling social interactions and more cohesive communities as well as the protection and enhancement of important biodiversity and landscape features.

**Policy EN2a: Biodiversity and Geodiversity** is a new policy. Policy EN2 in the adopted core strategy is under review and has been replaced by two policies, EN2a and EN2b. The preferred option for EN2a would seek to promote the protection, enhancement, restoration and expansion of biodiversity and geodiversity in the district. The policy would support a network of designated sites, including SPAs, SACs, Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR), Local Wildlife Sites (LWS), Local Geological Sites (LGS) and Local Wildlife Networks (LWN). The policy would require any development that would have a likely significant effect of the North and South Pennine SPAs and SACs to be subject to a Habitats Regulation Assessment (HRA), where the HRA could not ascertain that there would be no adverse effects on the site then the project would be refused, unless the plan or project met the requirements of Article 6(4) of the Habitats Directive. The policy would also prevent developments that would result in an adverse impact within or outside a SSSI or to a LWS or LGS, unless the benefits of the development, at the site, would clearly outweigh impacts to the sites and would not result to impacts to the SSSI National Network or lead to loss of habitat. EN2a would also set out the role of the Wildlife Habitat Networks and ensure the protection and expansion of the Networks through future development. The final aspect of EN2a would ensure the consideration of Habitats and Species of Principal Importance in the determination of planning applications and ensure that adverse impacts would be reduced and minimised through protection, mitigation, enhancement and, as a last resort, compensatory measures, through planning conditions and/or obligations. The policy would be highly likely to support the protection and enhancement of biodiversity and geodiversity in the district; however, it is unclear how likely other benefits would be to outweigh the protection of some of the designated sites including SSSIs, LWS and LGS.

- **EN2a Reasonable Alternative 1 (EN2aRA1):** The first reasonable alternative would exclude the social outcome criteria from the biodiversity net gain section. This alternative would be expected to result in largely similar impacts to the preferred option but with more limited positive impacts on the social spheres of sustainability.
- **EN2a Reasonable Alternative 2 (EN2aRA2):** The second reasonable alternative would seek to achieve a positive social net gain. This alternative would be expected to result in largely similar impacts to the preferred option but would be likely to delivery positive impacts on the social spheres of sustainability to a higher magnitude although, given the financial burdens this could place on schemes, there is a lower degree of certainty behind the impact than there is for the preferred option.
- **EN2a Reasonable Alternative 3 (EN2aRA3):** The third reasonable alternative would seek to reduce the scale and coverage of the policy. This would make the policy easier to follow and likely easier to enforce but could risk being insufficient in detail to ensure that a biodiversity net gain is achieved. This alternative would be expected to result in largely similar impacts to the preferred option but given the uncertainty over what elements of the preferred option would be scaled back on, it is considered to be likely that the positive impacts of EN2RA3 would be of a lower magnitude than they are for the preferred option.

**Policy EN2b: Biodiversity and Development** The preferred option for EN2b would seek to ensure that all development would deliver a measurable net gain in biodiversity value. The policy would not permit development that would result in a net loss of sites and species of ecological value and would ensure that development that would result in a net loss would be avoided where possible. EN2b would ensure that where adverse impacts are unavoidable, they would be minimised as far as possible with appropriate

compensation. With regards to major developments or development proposals that are likely to affect biodiversity, EN2b would require an appropriate level of ecological survey or report, and where a proposal would be below the thresholds for ecological assessment, a proportionate and measurable net gain for biodiversity would be incorporated into the design, relevant to the local area. The policy would ensure that net biodiversity gains would be relevant to local biodiversity priorities and would seek to protect and enhance species of local, national and international importance. The policy would be highly likely to protect biodiversity and ensure developments deliver local and relevant net biodiversity gains.

- **EN2b Reasonable Alternative 1 (EN2bRA1):** The first reasonable alternative would exclude the social outcome criteria from the biodiversity net gain section. This alternative would be expected to result in largely similar impacts to the preferred option but with more limited positive impacts on the social spheres of sustainability.
- **EN2b Reasonable Alternative 2 (EN2bRA2):** The second reasonable alternative would seek to achieve a positive social net gain. This alternative would be expected to result in largely similar impacts to the preferred option but would be likely to delivery positive impacts on the social spheres of sustainability to a higher magnitude although, given the financial burdens this could place on schemes, there is a lower degree of certainty behind the impact than there is for the preferred option.

**Policy EN3: Historic Environment** is not under review. The proposed policy would seek to preserve, protect and enhance the character, appearance, archaeological and historic value and significance of the Districts designated and undesignated heritage assets. The policy would require all development proposals to conserve and where appropriate enhance the significance of the District's heritage assets, especially those that contribute to Bradford's distinctive character. The policy would specifically safeguard Saltaire World Heritage Site and ensure any development within the Site or its buffer zone would contribute to the value of the area. The policy would also seek to conserve the integrity of listed buildings within the District through restricting alteration and where possible, retaining the original use of buildings. The policy would also support heritage-led regeneration initiatives, especially those in areas where the historic environment has been identified as at risk. EN3 would be highly likely to maintain and enhance Bradford's heritage assets which would be likely to help to enhance the recreational, cultural and leisure offerings in the District and benefit the local people and the local economy.

**Policy EN4: Landscape** is not under review. The proposed policy would seek to safeguard and enhance the character of local landscapes and the setting of settlements in the District. The policy would seek to ensure that plans, policies and proposals make positive contributions towards the conservation, management and enhancement of the diversity of landscapes within the District. The policy would set out criteria for assessing whether change could be acceptable. The policy would ensure that where there is potential for adverse landscape and/or visual effects, a visual impact assessment will be undertaken. EN3 would be highly likely to preserve Bradford's varied townscapes and landscapes which would be likely to help to maintain the recreational, cultural and leisure offerings in the District and benefit the local people and the local economy.

**Policy EN5: Trees and Woodland** is under review. The preferred option would be to seek to protect and enhance tree and woodland cover in the District to support climate action and to enhance the District's character. The policy would ensure that the enhancement of tree and woodland cover would be targeted, native tree planting and would contribute to enhancing biodiversity within the District. The policy would not permit developments which would destroy or have adverse impacts on ancient semi-natural woodland, including replanted ancient woodland and/or ancient or veteran trees. The presumption in favour of retaining and enhancing tree, woodland and hedgerow cover will particularly be for those that contribute to setting, landscape character, amenity and habitats. The policy would encourage all new developments to integrate additional trees and woodland into their proposals and preserve any existing healthy trees. The policy would also ensure that if trees are lost or damaged during construction they are replaced and maintained in their place, with at least one new tree provided for every tree lost. EN5 would be highly likely to contribute towards offsetting Bradford's carbon footprint, enhancing local biodiversity and protecting the setting, character and amenity of communities throughout the District. The Council considered that no reasonable alternatives to the reviewed policy were available as the amendments are in order to conform with national policy and the best available evidence.

**Policy EN6: Energy** is under review. The Council's preferred option would be to seek to encourage the provision of renewable and low carbon energy in the district through plans, strategies, investment decisions and programmes developed by the council and its partners. The policy would require the council and partners to identify suitable areas and opportunities; ensure the developments are at a scale that will make a positive impact; and, set out the local requirements for the use of decentralised energy and sustainability of buildings. The policy would ensure that all proposals for renewable and low carbon energy generation will undergo full environmental, economic and social impact assessments. The required environmental assessment would ensure that no development would have adverse impacts on the integrity of the South Pennine Moors SAC/SPA. The policy would be highly likely to encourage the generation of renewable and low carbon energy and to reduce GHG emissions in the District.

- **EN6 Reasonable Alternative 1 (EN6RA1):** The reasonable alternative available to the Council was to retain the existing policy in the adopted Core Strategy. Whilst there are only relatively minor differences between EN6 and EN6RA1, the reasonable alternative is considered to be slightly less strong on renewable energy generation and consumption. EN6RA1 would therefore be expected to result in mostly similar impacts to EN6, but potentially of a slightly more limited magnitude.

**Policy EN7: Flood Risk** is under review. The changes made to the policy have been in order to make the policy conform with the new Strategic Flood Risk Assessment in Bradford as well as to be strengthened in relation to surface water run-off, SuDS and Natural Flood Management. The Council considered that an alternative to this strengthening of the policy would not be reasonable. The proposed policy would seek to manage the District's flood risk through a series of principles applied during proposal assessment. The principles outlined in the policy would seek to ensure that proposals do not exacerbate flood risk and ensure that appropriate measures to mitigate and protect developments from flood risk are included within proposals. The policy would require any development allocated in an area of flood risk to be 'appropriately resilient' to flooding and require sequential testing to be integrated into all levels of planning. Proposals would be required to address and manage all sources of flood risk, especially along beck corridors, and would only be permitted where they would not increase flood risk. The policy would require developments on greenfield sites to have run-off rates that are no greater than the existing overall greenfield rates. The policy would also require flood storage provision in FZ2, FZ3a and along the River Aire and Wharfe corridors to be included in proposals, as well as the inclusion of SuDS and GI, informed by flood risk data. The policy would prevent the Council from permitting development in functional floodplain areas, with the exception of water compatible uses and essential infrastructure. The policy would be highly likely to contribute to managing the District's vulnerability to present and future flood risk.

**Policy EN8: Environmental Protection Policy** is under review. The policy has been strengthened in response to feedback from stakeholder consultees. The Council considers that an alternative to this would not be reasonable. The proposed policy would seek to protect public health and the environment through ensuring that any proposal that is likely to cause pollution, risk exposure to sources of pollution or pose a risk to safety will only be acceptable if the proposal implements measures to control pollution or risk, to a level that provides a high standard of protection for health, environmental quality and amenity. The policy highlights several areas of which particular attention would be paid. The policy would ensure that developments would not exacerbate existing air quality issues beyond acceptable levels and where air quality is a matter of concern proposals would be required to deliver positive air quality impacts. The policy would ensure that, where development proposals are allocated on land which may be contaminated, appropriate investigation and remedial measures would be taken. The policy would require proposals to identify potential nuisance issues and address the impacts of on the development from existing land uses. The policy would also ensure that proposals have no adverse impact on water bodies and groundwater sources, in terms of quality, quantity and the ecological features they support. Additionally, the policy would aim to improve the ecological status of water within the District thereby helping to meet the requirements of the Water Framework Directive. EN8 would be highly likely to safeguard air quality and water resources and reduce the risks of land contamination and nuisance related impacts in the District which would be likely to contribute to creating a safe and pleasant environment for local residents.

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		EN1	+	Bradford District	T/R	LT	M	<p>EN3 &amp; EN7 → no discernible impacts.</p> <p>EN1, EN2a and its alternatives, EN2b and its alternatives, EN4 &amp; EN5 → protection &amp; enhancement of greenfields, greenspaces, vegetation and tree canopy → protection and enhancement of important carbon sinks, including soils, grasses and trees → some degree of offsetting of Bradford's contributions towards the causes of climate change.</p> <p>Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives.</p> <p>EN6 &amp; EN6RA1 → encourage the provision of renewable and low carbon energy → reduce GHG emissions.</p> <p>EN8 → require developments to mitigate and offset emissions and impacts in accordance with the Low Emission Strategy for Bradford.</p> <p><b>Recommendations:</b> <i>The Council could consider encouraging development proposals to show how the carbon sink capacity of local green infrastructure, including trees, grasses and soils, would be protected and enhanced following development. EN6 could include more aspirational and defined targets for renewable energy generation and consumption in Bradford. The CSPR could include a map identifying key opportunity areas for different types of renewable energy generation.</i></p>
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	+	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	+	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	+	Bradford District	T/R	LT	L	
		EN3	○	Bradford District	n/a	n/a	H	
		EN4	+	Bradford District	T/R	LT	M	
		EN5	+	Bradford District	T/R	LT	L	
		EN6	++	National	T/R	LT	M	
		EN6RA1	++	National	T/R	LT	L	
EN7	○	Bradford District	n/a	n/a	H			
EN8	++	Bradford District	T/R	LT	M			
2. Waste		EN1	○	Bradford District	n/a	n/a	H	<p>EN8 → control over pollution → encourage development and site users to more appropriately manage consumption of materials and generation of waste + to dispose of this waste in accordance with the need to avoid pollution.</p> <p>Each other policy and alternative → no discernible impacts.</p> <p><b>Recommendations:</b> <i>None.</i></p>
		EN2a	○	Bradford District	n/a	n/a	H	
		EN2aRA1	○	Bradford District	n/a	n/a	H	
		EN2aRA2	○	Bradford District	n/a	n/a	H	
		EN2aRA3	○	Bradford District	n/a	n/a	H	
		EN2b	○	Bradford District	n/a	n/a	H	
		EN2bRA1	○	Bradford District	n/a	n/a	H	
		EN2bRA2	○	Bradford District	n/a	n/a	H	
		EN3	○	Bradford District	n/a	n/a	H	
		EN4	○	Bradford District	n/a	n/a	H	
		EN5	○	Bradford District	n/a	n/a	H	
		EN6	○	Bradford District	n/a	n/a	H	
		EN6RA1	○	Bradford District	n/a	n/a	H	
		EN7	○	Bradford District	n/a	n/a	H	
EN8	+	Bradford District	T/R	LT	L			
3. Land & buildings		EN1	++	Bradford District	n/a	n/a	H	<p>EN1, EN2a &amp; its alternatives, EN2b &amp; its alternatives, EN4 and EN5 → protect and enhance greenspaces, GI and sites with biodiversity and geodiversity value → encourage more efficient and sustainable use of land and soils. Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives..</p> <p>EN7 → help to protect land from being lost to flooding.</p> <p>EN3, EN6, EN6RA1, &amp; EN8 → no discernible impacts.</p>
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	+	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		EN2b	+	Bradford District	T/R	LT	M	<b>Recommendations: None.</b>
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	+	Bradford District	T/R	LT	L	
		EN3	O	Bradford District	n/a	n/a	H	
		EN4	+	Bradford District	T/R	LT	M	
		EN5	+	Bradford District	T/R	LT	M	
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	
		EN7	+	Bradford District	T/R	LT	L	
4. Climate change vulnerability		EN1	+	Bradford District	T/R	LT	M	EN1 → protect & enhance extent of open/green spaces → protect & enhance natural flood risk alleviation & climate cooling services → benefits to climate change resilience. EN2a & EN2b and their alternatives → preserve existing important ecological habitats → maintain green and vegetated areas → maintain infiltration and interception of rainwater → reduce flood risk. Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives. EN5 → preserve and enhance tree and woodland cover → maintain and increase infiltration and interception of rainwater → reduce flood risk. EN7 → proactively address flood risk → increase flood storage + flood risk management + implementation of SuDS and GI → manage and reduce flood risk. EN3 & EN4 & EN8 → no discernible impacts. <b>Recommendations: EN7 includes an aspiration of managing and reducing impacts of flooding within the Beck corridors in a manner that enhances their value for wildlife. This should be extended to all river corridors &amp; riparian habitats in Bradford in order to enhance their biodiversity value whilst also enhancing the natural provision of a flood risk alleviation service, particularly for river corridors upslope.</b>
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	+	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	+	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	+	Bradford District	T/R	LT	L	
		EN3	O	Bradford District	n/a	n/a	H	
		EN4	O	Bradford District	n/a	n/a	H	
		EN5	++	Bradford District	T/R	LT	M	
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	
EN7	++	Bradford District	T/R	LT	M			
EN8	O	Bradford District	n/a	n/a	H			
5. Water resources		EN1	+	Bradford District	T/R	LT	M	EN1, EN2a & EN2b and their alternatives → protect & enhance habitats and greenspaces → protect & enhance quality of water resources within these spaces + preserve natural water filtration properties of green areas (e.g. woodlands). Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives. EN5 → preserve and enhance tree and woodland cover → maintain and increase water filtration properties of woodlands → maintain and improve water quality. EN7 → minimise run off from new developments + enhance wildlife value of beck corridors → maintain water quality and ecological value. EN8 → safeguard ground and surface water quality + protect and improve quality, quantity and ecological status of water in Bradford. EN3, EN4, EN6 & EN6RA1 → no discernible impacts.
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	+	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	+	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	+	Bradford District	T/R	LT	L	
		EN3	O	Bradford District	n/a	n/a	H	
EN4	O	Bradford District	n/a	n/a	H			

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		EN5	+	Bradford District	T/R	LT	M	<b>Recommendations:</b> EN7 could include specific reference to the need to enhance biodiversity value along all river corridors and not just along the Beck, not only for the biodiversity value or flood risk alleviation service this provides but also for the water quality improvements it can deliver.
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	
		EN7	++	Bradford District	T/R	LT	M	
		EN8	++	Bradford District	T/R	LT	M	
6. Biodiversity & geodiversity		EN1	++	Bradford District	T/R	LT	M	EN1 → protect & enhance open/green spaces in the District → protect & enhance habitats & connectivity.
		EN2a	++	Bradford District	T/R	LT	M	EN2a & its alternatives → protect important ecological habitats → support the protection and enhancement of biodiversity and geodiversity in the district.
		EN2aRA1	++	Bradford District	T/R	LT	L	EN2b → ensure the protection of important ecological sites + ensure developments deliver local and relevant net biodiversity gains → protect and enhance biodiversity and geodiversity. Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives.
		EN2aRA2	++	Bradford District	T/R	LT	L	
		EN2aRA3	++	Bradford District	T/R	LT	L	EN3 → protect registered parks, gardens and landscapes → preserve habitats + protect biodiversity value.
		EN2b	++	Bradford District	T/R	LT	M	EN4 → contribute to landscape restoration, habitat connectivity and enhancement of semi-natural vegetation and natural greenspaces → protect and enhance biodiversity.
		EN2bRA1	++	Bradford District	T/R	LT	L	EN5 → protect and enhance tree and woodland cover → protect and enhance biodiversity value of sites + ecological connectivity.
		EN2bRA2	++	Bradford District	T/R	LT	L	
		EN3	+	Bradford District	T/R	LT	M	EN7 & EN8 → protect & enhance ecological value of waterways.
		EN4	++	Bradford District	T/R	LT	M	
		EN5	++	Bradford District	T/R	LT	M	<b>Recommendations:</b> EN1 should ensure a good design and layout of residential green spaces so they are connected with each other and provide good ecological corridors. EN2a could seek to clarify what development benefits would outweigh the protection of designated sites. EN5 could seek to ensure there is a net increase in total tree canopy in Bradford and that trees, hedgerows and woodland are all joined together in one coherent network. EN7 could seek to ensure that biodiversity value and wildlife habitats along all river corridors, not just the Beck, are protected and enhanced.
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	
EN7	+	Bradford District	T/R	LT	M			
EN8	++	Bradford District	T/R	LT	M			
7. Landscape & townscape		EN1	+	Bradford District	T/R	LT	M	EN1 → protect & enhance open/green spaces → protect & enhance the local character & setting of heritage assets & historic areas.
		EN2a	++	Bradford District	T/R	LT	M	EN2a & EN2b and their alternatives → protect important ecological habitats → protect natural landscapes and environments + prevent development on ecologically important land → protection of greenfield sites.
		EN2aRA1	++	Bradford District	T/R	LT	L	
		EN2aRA2	++	Bradford District	T/R	LT	L	Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives.
		EN2aRA3	++	Bradford District	T/R	LT	L	
		EN2b	++	Bradford District	T/R	LT	M	EN3 → protect and enhance the District's heritage → protect a range of heritage assets (buildings, infrastructure, townscapes and landscapes) → protect and enhance the historic character of landscapes and townscapes.
		EN2bRA1	++	Bradford District	T/R	LT	L	EN4 → require landscape character assessments + manage and enhance the diversity of landscapes → ensure the protection of landscapes and views towards landscapes + enhance landscapes.
		EN2bRA2	++	Bradford District	T/R	LT	L	
		EN3	++	Bradford District	T/R	LT	M	EN5 → protect and enhance tree and woodland cover + require the consideration of the value of trees and woodland to character, setting and landscapes + protect ancient woodland and veteran trees → ensure protection of landscapes and the character and setting of settlements + enhance setting through inclusion of trees and woodland in developments.
		EN4	++	Bradford District	T/R	LT	M	
		EN5	++	Bradford District	T/R	LT	M	EN7 → enhanced wildlife along Beck corridors → positive impact on local character.
		EN6	O	Bradford District	n/a	n/a	H	
EN6RA1	O	Bradford District	n/a	n/a	H			
		EN7	+	Bradford District	T/R	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
8. Cultural heritage		EN8	+	Bradford District	T/R	LT	M	EN8 → protect landscapes, townscapes and heritage assets from the impacts of air, noise and light pollution → preserve character and setting. EN6 & EN6RA1 → no discernible impacts.  <b>Recommendations: None.</b>
		EN1	+	Bradford District	T/R	LT	M	
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	+	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	+	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	+	Bradford District	T/R	LT	L	
		EN3	++	Bradford District	T/R	LT	M	
		EN4	++	Bradford District	T/R	LT	M	
		EN5	++	Bradford District	T/R	LT	M	
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	
		EN7	O	Bradford District	n/a	n/a	H	
EN8	+	Bradford District	T/R	LT	L			
9. Air quality		EN1	+	Bradford District	T/R	LT	M	EN1, EN2a & EN2b and their reasonable alternatives → protect & enhance greenspaces & habitats → protect & enhance extent of vegetation → increase in natural air filtration service → improvements to air quality. Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives. EN3 & EN4 → no discernible impacts. EN5 → protect and increase tree and woodland cover → protect trees and woodlands which have air filtration properties → protects and improves air quality. EN6 & EN6RA1 → encourage the provision of renewable and low carbon energy → reduce air pollution from traditional forms of energy generation → improves air quality. EN6RA1 likely to be of a slightly lower magnitude. EN8 → proactively maintain and improve air quality → require developments to mitigate and offset emissions and impacts + in areas with air quality concerns developments would be required to deliver positive impacts on air quality → protect and improve air quality.
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	M	
		EN2aRA2	+	Bradford District	T/R	LT	M	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	+	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	M	
		EN2bRA2	+	Bradford District	T/R	LT	M	
		EN3	O	Bradford District	n/a	n/a	H	
		EN4	O	Bradford District	n/a	n/a	H	
		EN5	+	Bradford District	T/R	LT	M	
		EN6	++	Bradford District	T/R	LT	M	
		EN6RA1	++	Bradford District	T/R	LT	L	
		EN7	O	Bradford District	n/a	n/a	H	
EN8	++	Bradford District	T/R	LT	M			
		EN1	O	Bradford District	n/a	n/a	H	Each Policy → no discernible impacts on the Transport SA Objective.
		EN2a	O	Bradford District	n/a	n/a	H	
		EN2aRA1	O	Bradford District	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
10. Transport		EN2aRA2	○	Bradford District	n/a	n/a	H	<p><b>Recommendations:</b> Policies could seek to ensure there is good walking/cycling access to designated public greenspaces to encourage active/sustainable transport to recreation sites. Public open green spaces should provide people with safe places to lock bicycles.</p>
		EN2aRA3	○	Bradford District	n/a	n/a	H	
		EN2b	○	Bradford District	n/a	n/a	H	
		EN2bRA1	○	Bradford District	n/a	n/a	H	
		EN2bRA2	○	Bradford District	n/a	n/a	H	
		EN3	○	Bradford District	n/a	n/a	H	
		EN4	○	Bradford District	n/a	n/a	H	
		EN5	○	Bradford District	n/a	n/a	H	
		EN6	○	Bradford District	n/a	n/a	H	
		EN6RA1	○	Bradford District	n/a	n/a	H	
EN7	○	Bradford District	n/a	n/a	H			
EN8	○	Bradford District	n/a	n/a	H			
11. Housing		EN1	+	Bradford District	T/R	LT	M	<p>EN1 → would require housing developments to provide new or improved open space, sport and recreational facilities → ensure housing developments provide sufficient recreational space → high-quality lives at home.</p> <p>All other options and alternatives → no discernible impacts.</p> <p><b>Recommendations: None.</b></p>
		EN2a	○	Bradford District	n/a	n/a	H	
		EN2aRA1	○	Bradford District	n/a	n/a	H	
		EN2aRA2	○	Bradford District	n/a	n/a	H	
		EN2aRA3	○	Bradford District	n/a	n/a	H	
		EN2b	○	Bradford District	n/a	n/a	H	
		EN2bRA1	○	Bradford District	n/a	n/a	H	
		EN2bRA2	○	Bradford District	n/a	n/a	H	
		EN3	○	Bradford District	n/a	n/a	H	
		EN4	○	Bradford District	n/a	n/a	H	
		EN5	○	Bradford District	n/a	n/a	H	
		EN6	○	Bradford District	n/a	n/a	H	
EN6RA1	○	Bradford District	n/a	n/a	H			
EN7	○	Bradford District	n/a	n/a	H			
EN8	○	Bradford District	n/a	n/a	H			
		EN1	++	Bradford District	T/R	LT	M	<p>EN1 → protection &amp; enhancement of existing outdoor recreational &amp; community spaces + would require some housing developments to provide new or improved open space, sport and recreational facilities → enhanced accessibility of and provision of these spaces + increased community cohesion.</p> <p>EN2a &amp; EN2b and their reasonable alternatives → protect important ecological habitats → ensure the protection of outdoor recreational areas e.g. South Pennine SPA/SAC.</p> <p>EN2a &amp; EN2b → proposals required to evaluate impacts on social wellbeing caused by achieving biodiversity net gain → social cohesion likely to be protected as a result. EN2aRA1 and EN2bRA1 would not require this. EN2aRA2 and EN2bRA2 would require a social wellbeing net gain alongside the biodiversity net gain. Impacts of</p>
		EN2a	++	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	++	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	++	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	++	Bradford District	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
12. Range of accessible services		EN3	O	Bradford District	n/a	n/a	H	EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives.  EN3 → protect and enhance the District's heritage → protect a range of heritage assets (buildings, infrastructure, townscapes and landscapes) → ensure the provision of culture and leisure facilities.
		EN4	+	Bradford District	T/R	LT	M	
		EN5	+	Bradford District	T/R	LT	M	
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	
		EN7	O	Bradford District	n/a	n/a	H	
		EN8	O	Bradford District	n/a	n/a	H	
13. Social Cohesion		EN1	++	Bradford District	T/R	LT	M	EN4 → manage and enhance landscapes in the District → ensure the provision of cultural and leisure spaces and facilities.  EN5 → protect and increase tree and woodland cover + protect ancient woodland and veteran trees → protect and enhance the availability of local cultural and leisure spaces + facilitate outdoor socialisation + protect and enhance residential amenity.  <i>Recommendations: Policies should ensure good walking/cycling access to designated public greenspaces to encourage active/sustainable transport to recreation sites and reduce recreational pressure on sensitive habitats.</i>
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	++	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	++	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	++	Bradford District	T/R	LT	L	
		EN3	+	Bradford District	T/R	LT	M	
		EN4	+	Bradford District	T/R	LT	M	
		EN5	+	Bradford District	T/R	LT	M	
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	
		EN7	O	Bradford District	n/a	n/a	H	
EN8	O	Bradford District	n/a	n/a	H			
14. Culture & leisure		EN1	++	Bradford District	T/R	LT	M	
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	++	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	++	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	++	Bradford District	T/R	LT	L	
		EN3	++	Bradford District	T/R	LT	M	
		EN4	+	Bradford District	T/R	LT	M	
		EN5	++	Bradford District	T/R	LT	M	
		EN6	O	Bradford District	n/a	n/a	H	
		EN6RA1	O	Bradford District	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		EN7	○	Bradford District	n/a	n/a	H	
		EN8	○	Bradford District	n/a	n/a	H	
15. Safe & secure		EN1	○	Bradford District	n/a	n/a	H	EN1, EN2a, EN2b, EN3, EN4 EN5, EN6 & EN7 and their alternatives → no discernible impacts. EN8 → prevent proposals that would lead to environmental safety risks → ensure remedial measures are undertaken for proposals on contaminated land to prevent risk to human health and public safety.  <b>Recommendations: None.</b>
		EN2a	○	Bradford District	n/a	n/a	H	
		EN2aRA1	○	Bradford District	n/a	n/a	H	
		EN2aRA2	○	Bradford District	n/a	n/a	H	
		EN2aRA3	○	Bradford District	n/a	n/a	H	
		EN2b	○	Bradford District	n/a	n/a	H	
		EN2bRA1	○	Bradford District	n/a	n/a	H	
		EN2bRA2	○	Bradford District	n/a	n/a	H	
		EN3	○	Bradford District	n/a	n/a	H	
		EN4	○	Bradford District	n/a	n/a	H	
		EN5	○	Bradford District	n/a	n/a	H	
		EN6	○	Bradford District	n/a	n/a	H	
		EN6RA1	○	Bradford District	n/a	n/a	H	
		EN7	○	Bradford District	n/a	n/a	H	
EN8	+	Bradford District	T/R	LT	M			
16. Health		EN1	++	Bradford District	T/R	LT	M	EN1 → protection & enhancement of existing outdoor recreational & community spaces + would require some housing developments to provide new or improved open space, sport and recreational facilities → encourage uptake of outdoor physical activity → benefits to mental and physical wellbeing. EN2a & EN2b and their alternatives → protect important ecological habitats → ensure the protection of outdoor recreational areas e.g. South Pennine SPA/SAC → encourage uptake of physical activity → benefits to mental and physical wellbeing. Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives. EN3, EN6, EN6RA1 & EN7 → no discernible impacts. EN4 → manage and enhance landscapes in the District → ensure the provision of cultural and leisure spaces and facilities → encourage uptake of physical activity → benefits to mental and physical wellbeing. EN5 → protect and increase tree and woodland cover → protect and increase the provision of cultural and leisure spaces + encourage uptake of physical activity → benefits to mental and physical wellbeing. EN8 → seek to protect public health → managing and reducing public exposure to air pollution and land/ water contamination.  <b>Recommendations: None.</b>
		EN2a	+	Bradford District	T/R	LT	M	
		EN2aRA1	+	Bradford District	T/R	LT	L	
		EN2aRA2	+	Bradford District	T/R	LT	L	
		EN2aRA3	+	Bradford District	T/R	LT	L	
		EN2b	+	Bradford District	T/R	LT	M	
		EN2bRA1	+	Bradford District	T/R	LT	L	
		EN2bRA2	+	Bradford District	T/R	LT	L	
		EN3	○	Bradford District	n/a	n/a	H	
		EN4	+	Bradford District	T/R	LT	M	
		EN5	+	Bradford District	T/R	LT	M	
		EN6	○	Bradford District	n/a	n/a	H	
EN6RA1	○	Bradford District	n/a	n/a	H			
EN7	○	Bradford District	n/a	n/a	H			
EN8	+	Bradford District	T/R	LT	M			
		EN1	○	Bradford District	n/a	n/a	H	Each policy and alternative → no discernible impacts.
		EN2a	○	Bradford District	n/a	n/a	H	
		EN2aRA1	○	Bradford District	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
17. Education		EN2aRA2	○	Bradford District	n/a	n/a	H	<b>Recommendations: None.</b>
		EN2aRA3	○	Bradford District	n/a	n/a	H	
		EN2b	○	Bradford District	n/a	n/a	H	
		EN2bRA1	○	Bradford District	n/a	n/a	H	
		EN2bRA2	○	Bradford District	n/a	n/a	H	
		EN3	○	Bradford District	n/a	n/a	H	
		EN4	○	Bradford District	n/a	n/a	H	
		EN5	○	Bradford District	n/a	n/a	H	
		EN6	○	Bradford District	n/a	n/a	H	
		EN6RA1	○	Bradford District	n/a	n/a	H	
		EN7	○	Bradford District	n/a	n/a	H	
EN8	○	Bradford District	n/a	n/a	H			
18. Employment		EN1	○	Bradford District	n/a	n/a	H	<p>EN3 → protect and enhance the District's heritage → protect a range of heritage assets (buildings, infrastructure, townscapes and landscapes) → supports tourism in the region → supports employment and economic growth.</p> <p>EN6 &amp; EN6RA1 → investment in renewable and low carbon energies → potential positive impact on employment opportunities and economic growth in energy sector.</p> <p>EN1, EN2a and its alternatives, EN2b and its alternatives, EN4 and EN5 → protect and enhance the amenity and visual attractiveness of central areas in Bradford → increase footfall in retail areas. Impacts of EN2a and EN2b likely to be of a slightly higher probability than their reasonable alternatives.</p> <p>All other policy options and alternatives → no discernible impacts.</p> <p><b>Recommendations: None.</b></p>
		EN2a	○	Bradford District	n/a	n/a	H	
		EN2aRA1	○	Bradford District	n/a	n/a	H	
		EN2aRA2	○	Bradford District	n/a	n/a	H	
		EN2aRA3	○	Bradford District	n/a	n/a	H	
		EN2b	○	Bradford District	n/a	n/a	H	
		EN2bRA1	○	Bradford District	n/a	n/a	H	
		EN2bRA2	○	Bradford District	n/a	n/a	H	
		EN3	+	Bradford District	T/R	LT	M	
		EN4	○	Bradford District	n/a	n/a	H	
		EN5	○	Bradford District	n/a	n/a	H	
		EN6	+	Bradford District	n/a	n/a	L	
		EN6RA1	+	Bradford District	n/a	n/a	L	
EN7	○	Bradford District	n/a	n/a	H			
EN8	○	Bradford District	n/a	n/a	H			
		EN1	+	Bradford District	n/a	n/a	L	
		EN2a	+	Bradford District	n/a	n/a	M	
		EN2aRA1	+	Bradford District	n/a	n/a	L	
		EN2aRA2	+	Bradford District	n/a	n/a	L	
		EN2aRA3	+	Bradford District	n/a	n/a	L	
		EN2b	+	Bradford District	n/a	n/a	M	
		EN2bRA1	+	Bradford District	n/a	n/a	L	
		EN2bRA2	+	Bradford District	n/a	n/a	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
19. Economy		EN3	+	Bradford District	T/R	LT	M	
		EN4	+	Bradford District	n/a	n/a	L	
		EN5	+	Bradford District	n/a	n/a	L	
		EN6	+	Bradford District	T/R	LT	L	
		EN6RA1	+	Bradford District	n/a	n/a	L	
		EN7	0	Bradford District	n/a	n/a	H	
		EN8	0	Bradford District	n/a	n/a	H	

Summary of, and assumptions in the assessment of, **Planning for Place: Minerals Policies EN9 – EN12**

**Policy EN9: New and Extended Minerals Extraction Sites** is not under review. The policy would support new investment in mineral extraction in the District. The policy sets out various criteria that proposals for new or expanded mineral extraction sites would need to conform with before being supported. The criteria includes protection for South Pennine Moors SPA; specific criteria for different mineral types; avoiding unacceptable adverse impacts on people or the environment; avoiding a net loss in biodiversity; and specific criteria for extraction sites on previously undeveloped land. The policy seeks to discourage development on greenfield sites by encouraging developers to consider options for exhausting or extending existing works before developing new sites. Mineral extraction sites can result in significant effects on several themes of sustainability, particularly where it is open-cast mining. The first step in extracting sand and gravel, for example, is to clear the surface of vegetation and topsoil. This destroys any biodiversity value on the site whilst reducing local ecological connectivity. The ecologically valuable soils are permanently lost. Impacts on land and biodiversity can be particularly severe as new or expanded mines are typically in relatively rural locations and for the same reason negative impacts on landscape character are highly likely. The process of extracting and transporting minerals can also be a significant source of GHG emissions and pollution, including particulate matter that is harmful to human health, whilst posing a major pollution or contamination risk to nearby natural waterbodies. EN9 includes a need for proposals to *'not result in unacceptable adverse impacts on people or the environment in terms of pollution, flooding or land stability risks, or harm to amenity, heritage assets or their settings, or harm the character of the landscape...'*. However, it is unclear at what point negative effects on these topics would be deemed 'unacceptable' and it is considered that avoiding or entirely mitigating a significant effect on many of these topics is unlikely. Without innovative and significant efforts at reclamation of the extracted land these effects would be long-term. It is considered to be highly likely that to support economic growth and continue investment employment within the mineral extraction industry.

**Policy EN10: Sandstone Supply** is not under review. The policy would provide support for investment in the local quarrying industry and support a managed supply of sandstone aggregates into West Yorkshire. The policy would support new quarries within defined search areas (to be defined in the Allocations DPD), where the reserves would be primarily used for the production of high-quality building, roofing and/or paving stones. EN10 would be highly likely to encourage new economic growth and enhanced employment opportunities within the quarrying industry. The provision of new aggregates would also be beneficial to repairs for buildings throughout Bradford, including Listed Buildings and Scheduled Monuments. EN10 includes the requirement for new quarries to be situated in locations *'outside of areas where the natural environment is protected under national and international statutory designations'* as well as *'outside of areas where further mineral extraction activities would be likely to lead to the loss or significant deterioration of any irreplaceable habitats, or to the permanent disruption of a significant ecological network'*. These criteria may help to limit negative impacts of sandstone quarries on biodiversity. However, given that sandstone quarrying requires the complete removal of aboveground vegetation and topsoil and is typically situated on greenfield land in rural locations, avoiding or entirely mitigating significant adverse effects on biodiversity and natural landscape character is considered to be unlikely. Sandstone quarries can also be a significant source of GHG emissions, air pollution (including particulate matter) and pose a pollution or contamination risk to nearby natural waterbodies.

**Policy EN11: Sand, Gravel, Fireclay and Coal Supply** is not under review. The policy would support the future extraction of sand, gravel, fireclay, coal, gas and oil in Bradford. where future changes in extraction technology and commodity prices make extraction viable. The policy would be highly likely to support economic growth and enhance employment opportunities within the extraction industry in Bradford. There are significant concerns about the environmental impacts of this policy, given the relationship between coal, oil and gas and the causes of climate change. Whilst the policy aims to minimise adverse environmental impacts, it is considered that the process of extracting fossil fuels, the transportation of these fuels and their ultimate consumption could be expected to be a significant source of GHG emissions and air pollution with consequences on a national scale. Not all extracted materials would be consumed, or result in their adverse impacts, in Bradford. The extraction of the minerals listed in this policy is a process that poses a significant risk to local water quality, air quality, biodiversity and natural landscapes and avoiding or entirely mitigating these negative impacts would be highly unlikely.

**Policy EN12: Mineral Safeguarding** is not under review. The policy would allocate Minerals Safeguarding Areas (MSA) in Bradford to prevent the sterilisation of sandstone, coal and sand and gravel resources by other forms of development. The policy would not prevent development but would ensure that due consideration was given the potential for extracting the minerals prior to development. EN12 contains the criteria and conditions by which development may occur in the MSAs. The policy would be highly likely to support and facilitate future management and extraction of mineral resources in the District and could therefore be seen as contributing towards the sustainability impacts

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associated with mineral extraction. Whilst the policy aims to minimise adverse environmental impacts, it is considered that avoiding or entirely mitigating the negative impacts of mineral extraction on the natural environment is highly unlikely (as per the summary text provided above for EN9 – EN11).

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		EN9	-	Bradford District	P/I	LT	H	EN9, EN10, EN11 & EN12 → permit and encourage energy intensive extraction industry + increase in HGV traffic for transportation of minerals → increase in GHG emissions. EN11 → future extraction of coal and hydrocarbons → consumption of fossil fuels → major source of GHGs.
		EN10	-	Bradford District	P/I	LT	H	
		EN11	--	National	P/I	LT	L	
		EN12	--	National	P/I	LT	H	
2. Waste		EN9	-	Bradford District	P/I	LT	M	EN9, EN10, EN11 & EN12 → new and expanded mineral extraction → large quantities of waste materials produced.
		EN10	-	Bradford District	P/I	LT	M	
		EN11	-	Bradford District	P/I	LT	M	
		EN12	-	Bradford District	P/I	LT	M	
3. Land & buildings		EN9	--	Bradford District	P/I	LT	M	Each policy → new and expanded mineral extraction on greenfield → permanent loss of greenfield ecologically valuable soils.
		EN10	--	Bradford District	P/I	LT	M	
		EN11	--	Bradford District	P/I	LT	M	
		EN12	--	Bradford District	P/I	LT	M	
4. Climate change vulnerability		EN9	○	n/a	n/a	n/a	H	Each policy → new and expanded extraction sites → loss of vegetation and permeable surfaces → exacerbated flood risk in the local area.
		EN10	○	n/a	n/a	n/a	H	
		EN11	○	n/a	n/a	n/a	H	
		EN12	○	n/a	n/a	n/a	H	
5. Water resources		EN9	--	Bradford District	T/R	LT	M	Each policy → new and expanded extraction sites → significant consumption of water at sites → pressure on water resources Each policy → new and expanded extraction sites → major pollution + contamination risk of natural waterbodies.
		EN10	--	Bradford District	T/R	LT	M	
		EN11	--	Bradford District	T/R	LT	M	
		EN12	--	Bradford District	T/R	LT	M	
6. Biodiversity & geodiversity		EN9	--	Bradford District	P/I	LT	M	Each policy → new and expanded extraction sites on previously undeveloped land in rural locations → direct loss of habitat & topsoil + reduction in ecological connectivity. Each policy → new and expanded extraction sites → air and water pollution → indirect on species & habitats.
		EN10	--	Bradford District	P/I	LT	M	
		EN11	--	Bradford District	P/I	LT	M	
		EN12	--	Bradford District	P/I	LT	M	
7. Landscape &		EN9	--	Bradford District	T/R	LT	H	Each policy → new and expanded extraction sites on previously undeveloped land in rural locations → significantly discordant with character of natural landscapes + avoidance of impacts on townscapes.
		EN10	--	Bradford District	T/R	LT	H	

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
townscape		EN11	--	Bradford District	T/R	LT	H	EN10 → increased supply of scarce materials required for the repair of historic buildings or monuments → enhanced townscape.
		EN12	--	Bradford District	T/R	LT	H	
8. Cultural heritage		EN9	+	Bradford District	T/R	LT	H	EN9, EN10 and EN11 → boosts to a traditional industry in Bradford and the wider region. EN10 → increase supply of scarce materials required for the repair of historic buildings or monuments. EN12 → no discernible impact.
		EN10	+	Bradford District	T/R	LT	H	
		EN11	+	Bradford District	T/R	LT	H	
		EN12	○	n/a	n/a	n/a	H	
9. Air quality		EN9	-	Bradford District	T/R	LT	M	EN9, EN10, EN11 & EN12 → new and expanded extraction sites → energy intensive extraction + increase in HGV activity → increased air pollution, including dust (PM2.5 & PM10) . EN11 → extraction of fossil fuels → consumption of fossil fuels → air pollution.
		EN10	-	Bradford District	T/R	LT	M	
		EN11	--	Bradford District	T/R	LT	M	
		EN12	-	Bradford District	T/R	LT	M	
10. Transport		EN9	-	Bradford District	T/R	LT	M	Each objective → support quarrying/mineral extraction industry → increased HGV activity → potential impacts on congestion, particularly if HGV activity increases in relatively rural locations on narrow roads or country lanes.
		EN10	-	Bradford District	T/R	LT	M	
		EN11	-	Bradford District	T/R	LT	M	
		EN12	-	Bradford District	T/R	LT	M	
11. Housing		EN9	○	n/a	n/a	n/a	H	EN10 → support local quarrying of high-quality building materials → local materials for house construction. EN12 → MSAs temporarily reduce land availability for housing developments. EN9 and EN11 → no discernible impacts.
		EN10	+	Bradford District	T/R	LT	M	
		EN11	○	n/a	n/a	n/a	H	
		EN12	-	Bradford District	T/R	LT	M	
12. Range of accessible services		EN9	○	n/a	n/a	n/a	H	Each policy → no discernible impacts.
		EN10	○	n/a	n/a	n/a	H	
		EN11	○	n/a	n/a	n/a	H	
		EN12	○	n/a	n/a	n/a	H	
13. Social Cohesion		EN9	+	Bradford District	T/R	LT	M	EN9, EN10, E11 & EN12 → support the quarrying and material/mineral extraction industries → maintains/increases employment in this sector in the District → reduce levels of deprivation.
		EN10	+	Bradford District	T/R	LT	M	
		EN11	+	Bradford District	T/R	LT	M	
		EN12	+	Bradford District	T/R	LT	M	
14. Culture & leisure		EN9	○	n/a	n/a	n/a	H	Each objective → no discernible impacts.
		EN10	○	n/a	n/a	n/a	H	
		EN11	○	n/a	n/a	n/a	H	
		EN12	○	n/a	n/a	n/a	H	
15. Safe & secure		EN9	○	n/a	n/a	n/a	H	Each objective → no discernible impacts.
		EN10	○	n/a	n/a	n/a	H	
		EN11	○	n/a	n/a	n/a	H	
		EN12	○	n/a	n/a	n/a	H	

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
16. Health		EN9	-	Bradford District	T/R	LT	M	Each policy → permit quarrying and material/mineral extraction → increased noise, odour and air pollution, including dust (PM2.5 & PM10), from extraction activities → pollution and airborne particulate matter hazardous to the health of workers and the public. Each policy → support employment → reduces poverty and deprivation → improves mental and physical well-being.
		EN10	-	Bradford District	T/R	LT	M	
		EN11	-	Bradford District	T/R	LT	M	
		EN12	-	Bradford District	T/R	LT	M	
17. Education		EN9	+	Bradford District	T/R	LT	M	EN9, EN10, EN11 and EN12 → new and expanded extraction sites → enhanced employment opportunities in this sector -> potential opportunities for local people to learn new on-the-job skills.
		EN10	+	Bradford District	T/R	LT	M	
		EN11	+	Bradford District	T/R	LT	M	
		EN12	O	n/a	n/a	n/a	H	
18. Employment		EN9	+	Bradford District	T/R	LT	M	EN9, EN0 and E11 → support the quarrying and material/mineral extraction industries → maintains/increases employment in the district EN11 → support the extraction of coal, gravel and sand where future changes in technology and commodity prices may make renewed extraction viable → future employment. EN9, EN10, EN11 & EN12 → new and expanded extraction sites → significant boost to this industry in Bradford → boost to local economy.
		EN10	+	Bradford District	T/R	LT	M	
		EN11	+	Bradford District	T/R	LT	L	
		EN12	+	Bradford District	T/R	LT	L	
19. Economy		EN9	+	Bradford District	T/R	LT	M	Each option → boost to an unsustainable industry that is unlikely to remain competitive in the long-term given the UK's transition towards a low-carbon economy and energy sector.
		EN10	+	Bradford District	T/R	LT	M	
		EN11	+	Bradford District	T/R	LT	L	
		EN12	+	Bradford District	T/R	LT	L	

**Summary of, and assumptions in the assessment of, Planning for Place: Waste Management Policies WM1 & WM2**

**Policy WM1: Waste management** is not under review. The policy would seek to establish a strategic waste management network in the District that would promote sustainable management of waste and recycling. WM1 sets out an intention for waste to be managed in accordance with the waste management hierarchy of 1. Prevention, 2. Preparing for re-use, 3. Recycling, 4. Other recovery and 5. Disposal). WM1 would be implemented through more detailed policies in the Waste Management DPD. The policy would require the Council to work collaboratively with partners and neighbouring authorities to help ensure a network of waste management facilities is established with enough capacity for all Commercial and Industrial (C&I) and Local Authority Collected Waste (LACW) arisings in the District. The policy sets out an intention for forecast waste arising to be managed in the most sustainable and environmental effective way possible and for Bradford to become net self-sufficient in waste management. The policy would be highly likely to increase the amount of waste that is re-used, recycled and recovered and therefore reduce the amount of waste sent to landfill. It could also lead to a reduction in the consumption of materials. Becoming net self-sufficient in waste management could reduce the need for waste to be transported long distances, such as to neighbouring authorities. Achieving this would require the delivery of new waste management facilities that could potentially result in negative impacts on the natural environment, such as on water quality, air quality, biodiversity, ecological connectivity or distinctive landscapes (particularly as it is likely that some or most of new facilities would be on greenfield land), although the likelihood and magnitude of these impacts is largely uncertain as it depends on the precise location of any new waste management facilities. The Waste Management DPD indicates that 17.62ha of land will be used for new waste management facilities and allocates six sites for new waste management facilities. It also sets out criteria for new or expanded facilities to manage construction and agricultural waste and the location of these new facilities is currently unknown.

**Policy WM2: Waste Management**

is not under review. The policy refers to identifying appropriate locations for waste management facilities that would be required to deal with all the waste arisings from LACW and C&I waste. The policy establishes the principles for identifying appropriate locations for waste management facilities and would ensure that all potential sites were subject to a detailed assessment that would consider their viability and their potential impacts on the surrounding environment. The new waste management facility sites have now been allocated in the Waste Management DPD adopted by the Council. It is considered to be likely that the policy would continue to help reduce the amount of waste sent to landfill and increase the amount of waste that is re-used, recycled and recovered.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		WM1	-	National	P/I	LT	M	WM1 → seek to establish new waste management facilities → construction and operation of additional facilities → increase GHG emissions. WM1 & WM2 → increase in 'energy from waste' facilities → increase in combustion → GHG emissions. WM1 & WM2 → reduced transportation distances for waste → reduction in associated GHG emissions.
		WM2	-	National	P/I	LT	M	
2. Waste		WM1	++	Bradford District	T/R	LT	M	WM1 & WM2 → increase reusing, recycling & composting → significantly reduce waste sent to landfill.
		WM2	++	Bradford District	T/R	LT	L	
3. Land & buildings		WM1	-	Bradford District	P/I	LT	L	WM1 & WM2 → at least 17.62ha of new waste management facilities → loss of greenfield & Green Belt land.
		WM2	-	Bradford District	P/I	LT	L	
4. Climate change vulnerability		WM1	-	Bradford District	T/R	LT	H	WM1 and WM2 → new waste management facility sites → potential loss of vegetation and permeable surfaces → exacerbated flood risk in the local area
		WM2	-	Bradford District	T/R	LT	H	

Appendix D – Policies Assessments

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
5. Water resources		WM1	-	Bradford District	T/R	LT	-	WM1 and WM2 → new waste management facilities including those near natural waterbodies (Waste Management DPD allocates one site adjacent to a small brook and another within 150m of the River Aire) → potential pollution & contamination risk of water during construction & operation of waste management facilities.
		WM2	-	Bradford District	T/R	LT	-	
6. Biodiversity & geodiversity		WM1	-	Bradford District	T/R	LT	H	WM1 & WM2 → permit development on greenfield and greenbelt land → loss of greenfield → loss of biodiversity and geodiversity & reduction in ecological connectivity.
		WM2	-	Bradford District	T/R	LT	H	
7. Landscape & townscape		WM1	-	Bradford District	T/R	LT	H	WM1 and WM2 → encourage a clean environment → protect townscape character. WM1 and WM2 → new waste management facilities on greenfield & Green Belt → risk of negative impacts on distinctive character of natural landscapes and local townscapes e.g. due to loss of open space & GI.
		WM2	-	Bradford District	T/R	LT	H	
8. Cultural heritage		WM1	-	Bradford District	T/R	LT	H	WM1 and WM2 → new waste management facilities on greenfield & Green Belt → risk of negative impacts on setting of nearby heritage assets.
		WM2	-	Bradford District	T/R	LT	H	
9. Air quality		WM1	-	Bradford District	T/R	LT	M	WM1 & WM2 → construction & operation of new waste management facilities → increase air pollution including particulate matter pollution. WM1 & WM2 → new 'energy from waste' facilities → increase in waste combustion → air pollution. WM1 & WM2 → management facilities closer to waste arisings → waste transported shorter distances → reduced HGV journeys → reduce air pollution associated with this.
		WM2	-	Bradford District	T/R	LT	M	
10. Transport		WM1	+/-	Bradford District	T/R	LT	L	WM1 & WM2 → shorter journeys for waste transportation vehicles → potentially less congestion associated with waste transport vehicles. WM1 & WM2 → Bradford self-sufficient in waste management → waste transportation vehicles stay within the District → potential increase in associated congestion.
		WM2	+/-	Bradford District	T/R	LT	L	
11. Housing		WM1	○	n/a	n/a	n/a	H	EN9 and EN11 → no discernible impacts.
		WM2	○	n/a	n/a	n/a	H	
12. Range of accessible services		WM1	○	n/a	n/a	n/a	H	WM1 and WM2 → No discernible impacts.
		WM2	○	n/a	n/a	n/a	H	
13. Social Cohesion		WM1	○	n/a	n/a	n/a	H	WM1 and WM2 → No discernible impacts on SA Objective 12.
		WM2	○	n/a	n/a	n/a	H	
14. Culture & leisure		WM1	-	Bradford District	T/R	LT	L	WM1 & WM2 → development on greenfield → potential loss of open recreational space.
		WM2	-	Bradford District	T/R	LT	L	
15. Safe & secure		WM1	○	n/a	n/a	n/a	H	WM1 and WM2 → no discernible impact
		WM2	○	n/a	n/a	n/a	H	
16. Health		WM1	-	Bradford District	T/R	LT	L	WM1 and WM2 → potential increase in local HGV activity + new waste combustion → noise, odour and air pollution including dust, PM2.5 & PM10 → potential adverse impacts on physical & mental health of local people.
		WM2	-	Bradford District	T/R	LT	L	
17. Education		WM1	○	n/a	n/a	n/a	H	WM1 and WM2 → no discernible impact

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
		WM2	○	n/a	n/a	n/a	H	
18. Employment		WM1	+	Bradford District	T/R	LT	M	WM1 and WM2 → seek to establish new waste management facilities → enhanced employment opportunities in this sector → maintains/increases employment in the District
		WM2	+	Bradford District	T/R	LT	M	
19. Economy		WM1	+	Bradford District	T/R	LT	M	WM1 and WM2 → seek to establish new waste management facilities → enhanced employment opportunities in this sector → maintains/increases employment in the District → boosts the local economy
		WM2	+	Bradford District	T/R	LT	M	

Summary of, and assumptions in the assessment of, **Planning for Place: Design Policies DS1 – DS5**

**Policy DS1: Achieving Good Design** is not under review. The policy would adopt a holistic approach towards ensuring that new development in Bradford contributes towards high-quality places. It seeks to do so by requiring proposals to show a good understanding of the local area and its context and to maximise on opportunities for improvement and regeneration, requiring developers to work with local communities on shared visions, establishing a referral and review system and avoiding piecemeal development that should compromise an area. The policy would be highly likely to help protect and enhance the character of areas throughout the District.

**Policy DS2: Working with the Landscape** is not under review. The policy would require proposals to take advantage of existing landscape features and to integrate them within the development whilst also linking development with the wider landscape and green space network. DS2 would therefore be highly likely to help ensure development protects and enhances the character of areas throughout the District, particularly in more rural locations. The requirement to ensure features and open spaces have a clear function would be likely to be beneficial to local people and communities, whilst the requirement to use plant species appropriate to local conditions whilst linking development with the wider green space network would be likely to have a range of positive environmental impacts.

**Policy DS3: Urban Character** is not under review. The policy would require development proposals to create a strong sense of place that is appropriate to the surrounding layout, scale, density, details and materials. The policy would be highly likely to help protect and enhance the character of areas throughout Bradford, particularly in more urban locations. The policy encourages proposals to take opportunities to create new public spaces, landscape features and cultural areas and this would help to ensure that people in Bradford can live in high-quality homes and cohesive communities. DS3 also sets out specific protection for heritage assets.

**Policy DS4: Streets and Movement** is not under review. The policy would seek to ensure that proposals are designed in a way that facilitates walking, cycling and using public transport for local people. This would be highly likely to contribute towards the District’s transition towards a lower-emission and more sustainable transport system. Higher rates of active travel would also benefit the physical and mental well-being of local people whilst enhancing their access to services, facilities and amenities. The policy also requires car parking to support the street scene and pedestrian environment and so whilst the use of cars will also be possible at new developments, negative impacts on character or walking and cycling are unlikely.

**Policy DS5: Safe and Inclusive Places** is not under review. The policy would seek to ensure that new development is designed in a way that local people can enjoy safe and high-quality lifestyles at home and in their community without diminishing the amenity of existing local people. This would be highly likely to benefit the health and wellbeing of local people. The policy requires buildings and places to be accessible for all people of all abilities and to encourage social interaction, which would help to ensure all people can access facilities, services, amenities whilst enhancing the cohesiveness of communities. DS5 also requires proposals to accommodate arrangements for waste and recycling storage and handling.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
1. Energy & GHGs		DS1	○	n/a	n/a	n/a	H	DS1 and DS3 → no discernible impact. DS2, DS4 and DS5 → more efficient access → reduced use of car → less GHG emissions from movement. DS4 → new and improved walking and cycling routes → significant improvement in low-emission movement.
		DS2	+	Bradford District	T/R	LT	M	
		DS3	○	n/a	n/a	n/a	H	
		DS4	++	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
		DS1	+	Bradford District	T/R	LT	M	DS2, DS3 and DS4 → no discernible impact. DS5 → waste and recycling storage and management accounted for in development design → sustainable
		DS2	○	n/a	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
2. Waste		DS3	○	n/a	n/a	n/a	H	management of waste and high rates of recycling.
		DS4	○	n/a	n/a	n/a	H	DS1 → efficient design and use of materials → reduction in material consumption and waste generation.
		DS5	+	Bradford District	T/R	LT	H	
3. Land & buildings		DS1	+	Bradford District	T/R	LT	M	DS1, DS2, DS4, DS4 and DS5 → high-quality & efficient design likely to avoid wasteful approach to land-use. DS2 & DS3 → incorporate existing open spaces & GI into development → reduced land loss.
		DS2	+	Bradford District	T/R	LT	M	
		DS3	+	Bradford District	T/R	LT	M	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
4. Climate change vulnerability		DS1	○	n/a	n/a	n/a	H	DS1, DS4 and DS5 → no discernible impacts. DS2 and DS3 → incorporate existing open spaces and GI into development → flood risk alleviation & climate cooling.
		DS2	+	Bradford District	T/R	LT	L	
		DS3	+	Bradford District	T/R	LT	L	
		DS4	○	n/a	n/a	n/a	H	
		DS5	○	n/a	n/a	n/a	H	
5. Water resources		DS1	○	n/a	n/a	n/a	H	DS1, DS4 and DS5 → no discernible impacts. DS2 and DS3 → incorporate existing open spaces and GI into proposals → protection of water quality.
		DS2	+	Bradford District	T/R	LT	L	
		DS3	+	Bradford District	T/R	LT	L	
		DS4	○	n/a	n/a	n/a	H	
		DS5	○	n/a	n/a	n/a	H	
6. Biodiversity & geodiversity		DS1	○	n/a	n/a	n/a	H	DS1, DS4 and DS5 → no discernible impact. DS2 and DS3 → incorporate existing open spaces and GI into development → protection of biodiversity areas and ecological connectivity.
		DS2	+	Bradford District	T/R	LT	H	
		DS3	+	Bradford District	T/R	LT	H	
		DS4	○	n/a	n/a	n/a	H	
		DS5	○	n/a	n/a	n/a	H	
7. Landscape & townscape		DS1	++	Bradford District	T/R	LT	H	DS1, DS2, DS3, DS4, DS5 → high-quality designed developments → protect, complement and enhance the character of surrounding areas + setting of heritage assets & historic areas in urban and rural locations. DS2 & DS3 → Open spaces and GI protected and enhanced → character, views + setting enhanced. DS3 → regeneration → use of derelict & brownfield sites > character + setting enhanced.
		DS2	++	Bradford District	T/R	LT	H	
		DS3	++	Bradford District	T/R	LT	H	
		DS4	++	Bradford District	T/R	LT	H	
		DS5	++	Bradford District	T/R	LT	H	
8. Cultural heritage		DS1	++	Bradford District	T/R	LT	H	
		DS2	++	Bradford District	T/R	LT	H	
		DS3	++	Bradford District	T/R	LT	H	
		DS4	++	Bradford District	T/R	LT	H	
		DS5	++	Bradford District	T/R	LT	H	
		DS1	○	n/a	n/a	n/a	H	DS1 → no discernible impacts on air quality or transport.
		DS2	+	Bradford District	T/R	LT	M	DS2 & DS3 → inclusion of GI and open spaces → air filtering from vegetation.

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
9. Air quality		DS3	+	Bradford District	T/R	LT	M	DS4 → improvements to walking & cycling options → increase in active travel rates. DS4 → improved access to public transport modes → increase in low-emission movements. DS4 & DS5 → high standard of accessibility of new development for all people.
		DS4	++	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
10. Transport		DS1	O	n/a	n/a	n/a	H	DS1, DS2, DS3, DS4 and DS5 → high-quality design of new proposals → local people can live in high-quality housing and neighbourhoods.
		DS2	+	Bradford District	T/R	LT	M	
		DS3	+	Bradford District	T/R	LT	M	
		DS4	++	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
11. Housing		DS1	+	Bradford District	T/R	LT	M	DS1, DS2, DS3, DS4 and DS5 → high-quality design of new proposals → local people can live in high-quality housing and neighbourhoods.
		DS2	+	Bradford District	T/R	LT	M	
		DS3	+	Bradford District	T/R	LT	M	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
12. Range of accessible services		DS1	O	n/a	n/a	n/a	H	DS1, DS2 and DS3 → no discernible impacts on SA Objective 12. DS4 → improved sustainable transport modes → enhanced access to services as well as leisure & culture areas. DS5 → development accessible for people of all abilities → improved access to nearby services. DS1, DS2, DS3, DS4 and DS5 → high-quality design of residential development → cohesive communities and protection of local cultural spaces and buildings.
		DS2	O	n/a	n/a	n/a	H	
		DS3	O	n/a	n/a	n/a	H	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
13. Social Cohesion		DS1	+	Bradford District	T/R	LT	M	DS2 and DS3 → Enhancement of open spaces and GI → facilitates social interactions, recreation, cultural activities and exercise at these spaces. DS3 → incorporation of cultural spaces into proposals → enhanced access for local people to these spaces. DS4 → enhanced active travel opportunities → increased outdoor exercise opportunities.
		DS2	+	Bradford District	T/R	LT	M	
		DS3	++	Bradford District	T/R	LT	M	
		DS4	++	Bradford District	T/R	LT	H	
		DS5	++	Bradford District	T/R	LT	H	
14. Culture & leisure		DS1	+	Bradford District	T/R	LT	M	DS1, DS2, DS3 and DS4 → high-quality design → safe and healthy lifestyles at home and at work. DS5 → specifically ensures development is designed in way that enables safe lifestyles. DS2 and DS3 → enhancement of open spaces and GI → good access to semi-natural habitats and outdoor exercise opportunities → benefits to physical and mental wellbeing. DS4 → enhanced active travel options → benefits to mental and physical wellbeing.
		DS2	+	Bradford District	T/R	LT	M	
		DS3	+	Bradford District	T/R	LT	M	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
15. Safe & secure		DS1	+	Bradford District	T/R	LT	M	DS1, DS2, DS3 and DS4 → high-quality design → safe and healthy lifestyles at home and at work. DS5 → specifically ensures development is designed in way that enables safe lifestyles. DS2 and DS3 → enhancement of open spaces and GI → good access to semi-natural habitats and outdoor exercise opportunities → benefits to physical and mental wellbeing. DS4 → enhanced active travel options → benefits to mental and physical wellbeing.
		DS2	+	Bradford District	T/R	LT	M	
		DS3	+	Bradford District	T/R	LT	M	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	++	Bradford District	T/R	LT	H	
		DS1	+	Bradford District	T/R	LT	M	
		DS2	+	Bradford District	T/R	LT	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
16. Health		DS3	+	Bradford District	T/R	LT	M	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	+	Bradford District	T/R	LT	M	
17. Education		DS1	○	n/a	n/a	n/a	H	DS1, DS2, DS3 and DS5 → no discernible impacts. DS4 → enhanced walking, cycling and public transport options → more sustainable access to educational facilities.
		DS2	○	n/a	n/a	n/a	H	
		DS3	○	n/a	n/a	n/a	H	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	○	n/a	n/a	n/a	H	
18. Employment		DS1	○	n/a	n/a	n/a	H	DS1, DS2, DS3 and DS5 → no discernible impacts on employment. DS4 → enhanced walking, cycling and public transport options → more sustainable access to employment areas. DS1, DS2, DS3, DS4 and DS5 → high-quality and attractive design → more visitors and greater footfall in central areas
		DS2	○	n/a	n/a	n/a	H	
		DS3	○	n/a	n/a	n/a	H	
		DS4	+	Bradford District	T/R	LT	M	
		DS5	○	n/a	n/a	n/a	H	
19. Economy		DS1	+	Urban centres	T/R	LT	M	
		DS2	+	Urban centres	T/R	LT	M	
		DS3	+	Urban centres	T/R	LT	M	
		DS4	+	Urban centres	T/R	LT	M	
		DS5	+	Urban centres	T/R	LT	M	

Summary of, and assumptions in the assessment of, **Planning for Place: Implementing and Delivery Policies ID1 – ID8**

**Policy ID1: Development Plan Documents and Authority Monitoring Report** is not under review. The policy sets out the role and function of each Development Plan Documents (DPD) and Authority Monitoring Report in delivering the vision, objectives and policies established in the Core Strategy. The policy includes the following DPDs: Bradford City Centre Action Plan DPD, Shipley & Canal Road Corridor Area Action Plan DPD, Land Allocations DPD, Bradford District Waste Management DPD and Neighbourhood Plans. The policy would also support the delivery of Supplementary Planning Documents, which would be used to accelerate the delivery of development schemes and infrastructure. The policy would support the preparation of Authority Monitoring Report (AMR) on a regular basis to report on the implementation of the Local Development Scheme, the effectiveness of local plan policies and performance of Development Management. This policy would facilitate the delivery of development through DPDS and SDPs, however the policies and therefore potential impacts of these DPD's are not yet known and so the impacts on many of the SA Objectives are mostly uncertain.

**Policy ID2: Viability** is under review. The intention of the review is to ensure the policy aligns with changes to national planning policy. It is considered that any alternative to the proposed approach i.e. an alternative that does not conform with national planning policy, would not be reasonable. The proposed policy seek to ensure that the Core Strategy and Local Plan are financially viable and deliverable. The policy would require the consideration of financial viability of a scheme where there are required planning obligations in addition to those considered as part of the Whole Plan Viability Assessment, or where it is demonstrated that there are exceptional site-specific viability issues not considered as part of the Whole Plan Viability Assessment. ID2 would help to ensure the delivery of schemes as part of the CSPR, however the schemes and therefore potential impacts of the schemes are not known yet and so the impacts on some of the SA Objectives are somewhat uncertain.

**Policy ID3: Developer Contributions** is not under review. The policy ensures that development proposals would contribute to the costs the development would impose on the District's services, infrastructure and environment. The policy would ensure the contribution would be calculated fairly and reasonably. ID3 would achieve this through a set of criteria that would determine the nature and scale of the contribution, the criteria would include: the scale and form of the development; the capacity of the existing infrastructure provision; the potential impact of the development on the surrounding area and facilities; the opportunity to support the public sectors equality duty; and the economic viability. The policy would also set out the procedure for developments that have significant impacts on Strategic Road Network or where a Community Infrastructure Levy is in place. The policy would be highly likely to support the provision and maintenance of community facilities and services in the District; however the nature and the extent of the contributions are not known yet and so the impacts on many of the SA Objectives are mostly uncertain.

**Policy ID4: Working with Partners** is not under review. The policy requires Bradford Council to work with a range of partners to ensure the requirements for new infrastructure and services in the District would be met. The policy would explore the future need and delivery of new infrastructure and identify sites for new or enhanced infrastructure. The policy would ensure that planned infrastructure would be recorded in an Infrastructure Delivery Schedule and would be accounted for in Area Action Plans and Development plans. The policy, alongside Policy ID5, would help to ensure the delivery of infrastructure and services, however the infrastructure and services are not known yet and their potential impacts are therefore largely uncertain.

**Policy ID5: Facilitating Delivery** is not under review. The policy ensures that Bradford Council and its partners make efficient and effective use of tools to facilitate growth and infrastructure provision in the District. The policy would encourage Bradford Council and other public sector organisations, to consider how future developments can contribute to the Core Strategy DPD and maximise public land and buildings nearby. The policy would support the co-location of facilities where this would increase public access. ID5 would also ensure AAPs, DPDs and Supplementary Planning Documents are prepared, and that Local Infrastructure Plan and Infrastructure Delivery Schedule are reviewed and updated to ensure commitment to development. The policy, alongside Policy ID4, would help to ensure the delivery of infrastructure and services, however the infrastructure and services are not known yet and their potential impacts are therefore largely uncertain.

**Policy ID6: Simplification of Planning Guidance to Encourage Sustainable Development** is not under review. The proposed policy supports the simplification of planning guidance to facilitate the efficient and effective delivery of sustainable development. It would achieve this through implementing the following tools - Simplified Planning Zones,

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Planning Performance Agreements, Article 4 Directions, Local/Neighbourhood Development Orders/ Community right to build orders and Supplementary Planning Documents. The policy would also encourage the use of other innovative tools which would help to simplify planning guidance and speed up the planning process.

**Policy ID7: Community Involvement** is not under review. The proposed policy seeks to ensure that the local community and stakeholders have early and meaningful engagement in the development of Local Plan Document and Planning Applications. ID7 would be likely to encourage community engagement in the planning processes and facilitate community ownership in local areas.

**Policy ID8: Regeneration Funding and Delivery** is not under review. The proposed policy requires Bradford Council to continue to support economic growth in the Region. The policy would support the use of a range of new and existing tools, such as Local Growth Fund, Voluntary Development Partnerships and New Homes Bonus. ID8 would be highly likely to support continued economic growth and development in the region.

SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
1. Energy & GHGs		ID1	?	Bradford District	T/R	LT	L	ID1 → The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are uncertain. ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain. ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain. ID6, ID7 & ID8 → no discernible impacts.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	
		ID8	O	Bradford District	n/a	n/a	H	
2. Waste		ID1	?	Bradford District	T/R	LT	L	ID1 → The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are uncertain. ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain. ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain. ID6, ID7 & ID8 → no discernible impacts.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	
		ID8	O	Bradford District	n/a	n/a	H	
3. Land & buildings		ID1	?	Bradford District	T/R	LT	L	ID1 → The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are uncertain. ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain. ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain. ID3, ID6, ID7 & ID8 → no discernible impacts.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	O	Bradford District	n/a	n/a	H	
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	
		ID8	O	Bradford District	n/a	n/a	H	
		ID1	?	Bradford District	T/R	LT	L	ID1 → The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
4. Climate change vulnerability		ID2	?	Bradford District	T/R	LT	L	SA objective are uncertain.
		ID3	?	Bradford District	T/R	LT	L	ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain.
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain.
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	ID6, ID7 & ID8 → no discernible impacts.
		ID8	O	Bradford District	n/a	n/a	H	
5. Water resources		ID1	?	Bradford District	T/R	LT	L	ID1→ The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are uncertain.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	O	Bradford District	n/a	n/a	H	ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain.
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain.
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	ID3, ID6, ID7 & ID8 → no discernible impacts.
6. Biodiversity & geodiversity		ID1	?	Bradford District	T/R	LT	L	ID1→ The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are uncertain.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain.
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain.
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	ID6, ID7 & ID8 → no discernible impacts.
7. Landscape & townscape		ID1	?	Bradford District	T/R	LT	L	ID1→ The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are uncertain.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain.
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain.
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	ID6, ID7 & ID8 → no discernible impacts.
8. Cultural heritage		ID1	?	Bradford District	T/R	LT	L	ID1→ The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are uncertain.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on this SA objective are uncertain.
		ID4	?	Bradford District	T/R	LT	L	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects Recommendations for avoidance, mitigation or enhancement
		ID5	?	Bradford District	T/R	LT	L	ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are uncertain. ID6, ID7 & ID8 → no discernible impacts.
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	
		ID8	O	Bradford District	n/a	n/a	H	
9. Air quality		ID1	?	Bradford District	T/R	LT	L	ID1 → The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on these SA objectives are uncertain. ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on these SA objectives are uncertain. ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on these SA objectives are uncertain. ID6, ID7 & ID8 → no discernible impacts.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	
		ID8	O	Bradford District	n/a	n/a	H	
10. Transport		ID1	?	Bradford District	T/R	LT	L	
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	
		ID8	O	Bradford District	n/a	n/a	H	
11. Housing		ID1	++	Bradford District	T/R	LT	M	ID1 → ensure that Bradford's development needs will be satisfied through the delivery of DPDs → ensure delivery of housing needs ID2 → ensure that Bradford's development needs are delivered through ensuring the viability of the Core Strategies → ensure the delivery of housing developments. ID3, ID4 & ID5 → help to ensure the provision of infrastructure and services → nature and the extent of these are not yet known → impacts on this SA objective are somewhat uncertain. ID6, ID7 & ID8 → no discernible impacts.
		ID2	+	Bradford District	T/R	LT	M	
		ID3	?	Bradford District	T/R	LT	L	
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	
		ID8	O	Bradford District	n/a	n/a	H	
12. Range of accessible services		ID1	+	Bradford District	T/R	LT	L	ID1 & ID2 → ensure that Bradford's development needs will be satisfied through the delivery of DPDs → ensure delivery of required services. ID4 & ID5 → ensure the provision of infrastructure and services. ID3 → ensure developer contributions towards local services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are somewhat uncertain. ID7 → seek to engage communities and local stakeholders in the development of local plans → enhances the
		ID2	+	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	
		ID4	+	Bradford District	T/R	LT	L	
		ID5	+	Bradford District	T/R	LT	L	
		ID6	O	Bradford District	n/a	n/a	H	
		ID7	O	Bradford District	n/a	n/a	H	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
13. Social Cohesion		ID8	O	Bradford District	n/a	n/a	H	sense of community ownership of local areas + inclusion of local problems and resolutions in the plans.
		ID1	?	Bradford District	T/R	LT	L	ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on SA Objectives 13 and 14 are uncertain.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	ID1& ID2 → The policies and therefore potential impacts of these other DPD's are not yet known and so impacts on SA Objectives 13 and 14 are uncertain.
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	ID7 → No discernible impacts on SA Objectives 12 and 14. ID6 & ID8 → no discernible impacts.
		ID6	O	Bradford District	n/a	n/a	M	
		ID7	+	Bradford District	T/R	LT	M	
ID8	O	Bradford District	n/a	n/a	M			
14. Culture & leisure		ID1	?	Bradford District	T/R	LT	L	
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	
		ID6	0	Bradford District	n/a	n/a	M	
		ID7	0	Bradford District	n/a	n/a	M	
		ID8	0	Bradford District	n/a	n/a	M	
15. Safe & secure		ID1	?	Bradford District	T/R	LT	L	ID1→ All of the DPDs identified to deliver the vision, objectives, core policies, thematic policies and sub area policies of the Core Strategy have the potential to impact upon safety and security. The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on this SA objective are somewhat uncertain.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	ID2 → The schemes and developments within the Core Strategy have the potential to impact upon safety and security. The schemes and therefore potential impacts of the schemes are not known yet and so impacts on this SA objective are somewhat uncertain.
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	ID3 → ensure developer contributions towards local services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are somewhat uncertain.
		ID6	O	Bradford District	n/a	n/a	M	
		ID7	O	Bradford District	n/a	n/a	M	ID4 & ID5 →ensure the provision of infrastructure and services → nature and the extent of these are not yet known → impacts on this SA objective are somewhat uncertain. ID6, ID7 & ID8 → no discernible impacts.
		ID8	O	Bradford District	n/a	n/a	M	
16. Health		ID1	?	Bradford District	T/R	LT	L	ID1→ The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on these SA objectives are uncertain.
		ID2	?	Bradford District	T/R	LT	L	
		ID3	?	Bradford District	T/R	LT	L	ID2 → schemes and developments, and therefore potential impacts of the schemes, are not known yet and so impacts on these SA objectives are uncertain.
		ID4	?	Bradford District	T/R	LT	L	
		ID5	?	Bradford District	T/R	LT	L	ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on these SA objectives are uncertain.
		ID6	O	Bradford District	n/a	n/a	M	
		ID7	O	Bradford District	n/a	n/a	M	ID6, ID7 & ID8 → no discernible impacts.
		ID8	O	Bradford District	n/a	n/a	M	

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SA Objective	Baseline trend	Policy or RA	Effect	Geographical extent	P/T I/R	Time	Prob.	Summary of effects <i>Recommendations for avoidance, mitigation or enhancement</i>
17. Education		ID1	?	Bradford District	T/R	LT	M	ID1 & ID2 → The policies and therefore potential impacts of these other DPDs are not yet known and so impacts on these SA objectives are uncertain. ID3, ID4 & ID5 → help to ensure provision of services and infrastructure → nature and the extent of these are not yet known → impacts on these SA objectives are uncertain. ID8 → ensure Bradford Council support economic growth through implementing a range of new and existing tools e.g. Growth Funds → potential to increase employment and training in the region. ID6 & ID7 → no discernible impacts.
		ID2	?	Bradford District	T/R	LT	M	
		ID3	?	Bradford District	T/R	LT	M	
		ID4	?	Bradford District	T/R	LT	M	
		ID5	?	Bradford District	T/R	LT	M	
		ID6	○	Bradford District	n/a	n/a	M	
		ID7	○	Bradford District	n/a	n/a	M	
		ID8	+	Bradford District	T/R	LT	L	
18. Employment		ID1	++	Bradford District	T/R	LT	M	ID1 → ensure that Bradford's development needs will be satisfied through the delivery of DPDs and SPDs → ensure the provision of employment opportunities. ID2 → ensure that Bradford's development needs are delivered through ensuring the viability of the Core Strategies → ensure the provision of employment opportunities. ID4 & ID5 → ensure the provision of infrastructure and services → maintenance and provision of employment. ID3 → ensure developer contributions towards local services and infrastructure → nature and the extent of these are not yet known → impacts on this SA objective are somewhat uncertain. ID6 & ID7 → no discernible impacts. ID8 → ensure Bradford Council support economic growth through implementing a range of new and existing tools e.g. Growth Funds → support employment and economic growth in the region
		ID2	+	Bradford District	T/R	LT	M	
		ID3	?	Bradford District	n/a	n/a	M	
		ID4	+	Bradford District	T/R	LT	M	
		ID5	+	Bradford District	T/R	LT	M	
		ID6	○	Bradford District	n/a	n/a	M	
		ID7	○	Bradford District	n/a	n/a	M	
		ID8	++	Bradford District	T/R	LT	M	
19. Economy		ID1	++	Bradford District	T/R	LT	M	ID3 → no discernible impacts on SA Objective 19
		ID2	+	Bradford District	T/R	LT	M	
		ID3	○	Bradford District	n/a	n/a	M	
		ID4	+	Bradford District	T/R	LT	M	
		ID5	+	Bradford District	T/R	LT	M	
		ID6	○	Bradford District	n/a	n/a	M	
		ID7	○	Bradford District	n/a	n/a	M	
		ID8	++	Bradford District	T/R	LT	M	