City of BRADFORD METROPOLITAN DISTRICT COUNCIL

Allocations Development Plan Document

Revised Site Assessment Methodology

July 2019 v2

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1. Introduction

1.1 The Council is preparing a new Local Plan for the district. One of the key roles of the Local Plan is to identify and allocate the sites which will provide for the Districts development needs. Sites (above a minimum threshold) will be assessed with a view to their potential allocation for the following uses:

- Housing including:
    - C3 Residential;
    - Special needs accommodation e.g. Elderly
    - Gypsies and Travellers and Travelling Showpeople;
    - Student accommodation (should a specific need be identified within the Council's SHMA or other evidence)
- Employment including:
    - B1a Office
    - B1b Research and Development
    - B2 (Manufacturing)
    - B8 (Warehousing)
- Retail and Leisure (if required following an update to the Council's Retail and Leisure Study)
- Infrastructure – including schools, highways, green and blue infrastructure;
- Minerals

1.2 Some sites may be assessed as being suitable for more than one use and / or could be identified as mixed use sites.

1.3 The plan will also identify any required new green and blue infrastructure including formal and informal open spaces in addition to protecting the existing network of open spaces.

1.4 The aim of this paper is to explain how the Council propose to assess and compare potential development sites setting out the stages involved, the criteria to be used and the evidence and information which will inform the assessment. The approach is being formulated to ensure that the choices made comply with the requirements of National Government Guidance, reflect local planning policies and the local context and in so doing generate sustainable options for meeting the District's needs. The approach also recognises the critical importance of promoting development sites and locations which can create healthy and safe places and sustainable communities.

1.5 In May and June 2016, the Council produced and published an initial site assessment methodology paper as part of the Allocations DPD Issues and Options consultation. This revised site assessment methodology reflects both the comments and submissions made and also any relevant changes to Government

Planning Policy. A full summary of the responses to the initial methodology can be found within the Statement of Public Consultation which can be viewed on the Council's web pages at the following address:

https://www.bradford.gov.uk/planning-and-building-control/planning-policy/land-allocations-dpd/?Folder=Issues+and+Options

1.6 The methodology has been designed to enable the assessment of a site's generic suitability for all the intended uses. However inevitably, based for example on national planning policy, there will be minor differences in some instances. Furthermore for some uses, particularly for minerals, employment and travellers there will be a number of use specific criteria which will be applied. These issues are covered in section 6.

1.7 The rest of this document starts by providing a brief overview of the national and local policy context. The preparatory work which has to be undertaken before site assessment can take place is outlined. Section 3 provides a diagrammatic overview of the whole assessment process. Subsequent sections look at each stage in turn ranging from a process to prioritise sites to the technical assessments and information which allow the impacts and benefits of potential sites to be assessed.

National Policy Context

1.8 In formulating its site assessment methodology and identifying individual site assessment criteria, the Council has had full regard to the Government policy as set out in the National Planning Policy Framework (NPPF) and the more detailed advice set out within the Government's Planning Practice Guidance (PPG).

1.9 The NPPF sets out the requirements for producing a Local Plan and states a fundamental part of the Local Plan is to allocate sites to promote development and flexible use of land, bring forward new land where necessary and provide detail on form, scale, access and quantum of development where appropriate. While neither the NPPF nor PPG sets out a specific approach to site assessment they do provide general guidance on the overall result of any site allocations process and provide specific guidance on a number of topics most notably on Green Belt, flood risk, protecting the natural and built environment and ensuring that plan proposals are deliverable. Key aspects for this methodology include:

- The 4 tests of soundness including the need for plans to be justified which is defined as 'an appropriate strategy, taking into account the reasonable alternatives'. A key task will therefore be to identify genuinely reasonable alternatives and thus screening out those which do not meet this test by virtue of suitability, availability or achievability considerations.
- Viability – plans are required to be effective i.e. deliverable over the plan period and changes to national guidance have put a greater emphasis on testing viability 'up front' at the plan making stage.

- Ensuring that the planning policies and decisions are conserving and enhancing the natural environment, by allocating land with the least environmental or amenity value (NPPF paragraph 171).
- Making as much use as possible of previously developed land (paragraphs 117-118).
- Applying NPPF paragraphs 136-7, which indicates that exceptional circumstances must exist in order for Local Plans to release land from the Green Belt. This means that in line with both the NPPF and Core Strategy Policies SC7 and HO7, this site assessment methodology will require - on a settlement by settlement basis - for all other non Green Belt options for meeting development targets to be fully examined and utilised.
- According fully with paragraphs 155-161 of the NPPF which seeks to avoid inappropriate development in areas at risk of flooding. The sequential approach will be integrated into the selection and allocation of sites. The SHLAA has already categorised as 'unsuitable' sites which fall within the functional flood plain, flood zone 3b.The remaining stages of this site assessment process outlined in this document – in particular the use of flood risk as a key criteria within the pooling and prioritising stage – will ensure that, when assessing site options within each settlement, new development is steered to the areas with the lowest risk of flooding. Assessments will need to take into account flooding from all sources and build in resilience to climate change. Where it is not possible to meet a settlement's development targets utilising sites within the lowest flood risk zone the Council will apply the exception test informed by SFRA Level 2 assessments. For any such allocations the Council will normally expect that more vulnerable development is located within those areas of the site at lowest risk of flooding. The Council will continue to work closely with the Environment Agency both in the preparation of its SFRA and its assessment of sites.

Local Policy Context

1.10 Local strategic policy as set out within the Council's Core Strategy has also been key. Since the initial site assessment methodology was published the Core Strategy has been adopted (in July 2017) and the NPPF revised (in July 2018 and February 2019).

1.11 The Allocations DPD will be required to conform to the strategic policies contained within the Core Strategy. The Core Strategy has set out a number of policies which are particularly relevant to site assessment and site selection. The key ones are set out in below.

Table 1.1: Core Strategy policies of particular relevance to the methodology

Policy SC5/A	sets out an approach to prioritising sites according to location and greenfield or brownfield status
Policy SC5/B	indicates an accessibility orientated approach to comparing sites
Policy SC7	identifies the need for Green Belt releases to meet the District's development needs
Policy SC8	sets out the approach to ensuring that the integrity of the South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC) are not adversely effected
Policy SC10	Provides a strategic context to creating healthy places, introduces health impact assessments for major developments and policy on the location of new health facilities / infrastructure.
Policy EC1	indicates general and geographical priorities for creating a successful district economy
Policy EC2	indicates the scale and distribution of new employment land to be provided
Policy EC5	indicates that new, appropriate scale of retail, leisure and office development should be encouraged in sequentially preferable locations (City/Town/District/Local centres) (criteria A to E)
Policy TR1	which indicates that development should be located so that the use of sustainable travel is maximised and the impact of development on existing transport networks is minimised
Policy HO6	indicates that plans should give priority to the development of previously developed land and buildings
Policy HO7	sets out a number of principles which should be followed in determining housing site allocations
Policy HO12	establishes the need for additional accommodation for gypsies and travellers and travelling showpeople and sets out criteria for new sites
Policy EN2 a & b	seeks to avoid adverse impacts on sites designated as importance to biodiversity or geodiversity and introduces the concept of biodiversity net gain.
Policy EN3	seeks to protect and enhance designated heritage assets and their settings
Policy EN4	relates to conservation, management and enhancement of landscapes
Policy EN5	relates to trees and woodlands
Policy EN7	seeks to manage and reduce flood risk and requires the integration of sequential testing into plan making so that site choices where possible avoid areas of higher flood risk
Policy EN8	relates to environmental protection and to the quality of air, water and land resources
Policy EN9	which sets out the overarching approach towards all new mineral development.

Policy EN10	which relates to sandstone supply.
Policy EN12	indicates the need to avoid the sterilisation of sandstone, coal, and sand and gravel resources

1.12 In line with the Council's updated Local Development Scheme (LDS) of July 2018, the Council has begun a partial review of certain aspects of the Core Strategy. Consultation on the scope and content of the Partial Review took place between the 11th January and 22nd February 2019. Work on the review is being carried out in parallel with the site allocations work. The Council are currently assessing the representations made. Subject to any changes resulting from that assessment the review will cover:

- A new plan period of 2020 to 2037
- Strategic housing policies including setting a new district wide housing requirement, revising the housing distribution, reassessing the need for affordable and special needs housing, and setting housing standards;
- Reassessing employment land requirements and retail and leisure needs;
- Reviewing whether, in the light of updated land supply evidence and revised housing and employment requirements, exceptional circumstances exist for change to the Green Belt boundaries;

1.13 The Council will keep the approach to site assessment under review pending the outcome of the Core Strategy Partial Review (CSPR) work.

Sustainability Appraisal

1.14 Given the range, complexity and extent of site choices which need to be assessed, and the presence of sometimes conflicting aims it is essential that there are mechanisms for assessing whether the emerging plan has chosen an appropriate range of sites. The Sustainability Appraisal process will fulfil this role.

1.15 The analysis within the SA will take into account the need for plans to achieve net gains across the different sustainability objectives – economic, social and environmental. This methodology therefore includes criteria which will ensure that the right evidence and assessments are produced to enable the Sustainability Appraisal process to assess the implications for the chosen allocations against these objectives and to consider whether any initially rejected sites would offer better outcomes.

Green Belt

1.16 The Council is currently in the process of undertaking a selective review of the Green Belt for the Bradford District. The review has been triggered by Policy SC7 of the adopted Core Strategy which indicates the need to make changes to the green belt in order to release land to meet the needs of the district for new homes and jobs.

1.17 The Green Belt Selective Review consists of the following 4 part process:

- Part 1 – Parcel Identification: Definition of strategic Green Belt parcels based upon defensible boundaries;
- Part 2 – Parcel Performance Analysis: Strategic review of Green Belt Parcels surrounding each of the settlements within the Core Strategy Hierarchy to examine their performance against the 5 purposes;
- Part 3 – Site Performance Analysis: Using the information gathered in Stage 1, undertake a review of the sites submitted to the Site Allocations DPD to examine their performance against the 5 purposes;
- Part 4 - This stage of the review will also put forward potential measures to offset performance related issues and safeguard the longevity of the Green Belt boundary.

1.18 Although the Core Strategy has set out in strategic terms the need for changes to the green belt it does not in itself establish the exceptional circumstances needed to change any specific green belt boundaries. Moreover the Core Strategy, including the approach to green belt is currently subject to a partial review.

1.19 The green belt selective review will contribute evidence to assess the merits of potential development sites which lie within the green belt, should those sites be needed. This site assessment methodology (in particular stages 2 and 5) has been designed to ensure that the requirement in both national policy and within the adopted Core Strategy to maximise the potential of non green belt sites and locations is reflected. It builds in the need to establish on a settlement by settlement basis whether there are exceptional circumstances for green belt change.

2. Laying the Foundations for Site Assessment

2.1 Before the assessment of sites can commence it is necessary to assemble the candidate sites list, develop the evidence base, and determine the site assessment methodology and the principles underlying it.

Site Threshold

2.2 The threshold for allocation of sites within the Plan is 0.2ha. In the case of potential housing sites the Council will also consider sites smaller than this where there is a prospect of securing at least 5 units. This represents a significant reduction is the normal site threshold adopted in most Local Plans (0.4ha) and to that adopted in the RUDP. The Council has taken this decision due to the scale of land required and also to maximise the use of development opportunities within built up areas and to minimise the release of green field or Green Belt sites.

Assembling A List of Candidate Sites

2.3 The starting point for the site selection process is to ensure that the Council has as wide and as complete a portfolio of site options as possible so that all reasonable site options have been identified and assessed.

2.4 The sites to be assessed are compiled from a number of sources which include:

- Former (unimplemented) development plan (RUDP) allocations;
- Sites with planning permission and extracted from the Council's Employment and Housing Land Registers;
- Call for sites submissions – the Council have issued previous calls for sites as part of its SHLAA work and received a large number of submissions from land owners, developers and members of the public;
- Site survey work;
- Master plans and neighbourhood plans;
- Council asset review – land or buildings which the Council considers are surplus to requirements.

Evidence Required At This Stage	Much of the data for this stage has already been gathered in other source documents including the SHLAA, Employment Land Review and Call for Sites submissions.

Developing the Evidence Base to Inform Assessment

2.5 The site assessment process is dependent on the targeted gathering of both general information and technical assessments. That information then allows both the impacts and benefits of the sites development to be assessed, the potential yields of sites to be quantified, and judgements to be made about the timing of when development could occur. The evidence and analysis will allow an assessment to be made of any mitigation required to ensure that impacts are minimised, that development respects the local context, and to identify any necessary on or off site infrastructure improvements. Clearly in some cases the evidence gathered will substantiate a conclusion that it would not be appropriate to allocate a site for development.

2.6 The main types of evidence to be collected includes:

- Desktop and survey work to establish information such as the nature of the site, its planning history, land ownership, current and adjoining land uses, and any possible development constraints such as topography, access, land contamination and accessibility to local services and public transport service;
- Internally produced studies which are updated on a regular basis such as the Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Review.
- Procurement of studies and assessments from third parties to address specific issues such as green belt review, strategic flood risk assessments.
- Information obtained from annual monitoring returns;

- Consultations and assessments from specialist teams within the Council including highways, drainage, public health, environmental protection, conservation and heritage, ecology and biodiversity and landscape. This will take the form of both detailed site appraisals and the involvement in overarching documents such as the SA and HiA;
- Advice and input from external organisations, infrastructure and utility providers, and other stakeholders such as the West Yorkshire Combined Authority, Highways England, Environment Agency, Sport England, Historic England, Yorkshire Water, the West Yorkshire Archaeology Service, West Yorkshire Ecology Service and the Coal Authority.
- Information, analysis and master planning work done by site promoters, land owners and developers.
- On-going liaison with local groups including Parish Council and Neighbourhood Planning bodies and formal consultation stages will also provide important inputs.

2.7 The Council's Planning Policy web pages has a specific section for evidence and further relevant information will be published at the Allocations DPD Preferred options stage.

https://www.bradford.gov.uk/planning-and-building-control/planning-policy/evidence-base/

3. Overview of Site Assessment Methodology Stages

3.1 The table below and diagram at figure 3.1 together provide a simple overview of the stages involved in reaching a set of preferred site options. Although stages are presented in sequence some of the stages will be carried out in parallel. The production of a final list of preferred site will be an iterative process with draft site lists being drawn up at several points in order to allow for stages such as the modelling of cumulative impacts to take place.

3.2 The colour coding within the diagram draws a distinction between:

Stages	Role	Aim and Outputs
	Prepare - Laying the foundations	Establishes parameters for work, a comprehensive list of candidate sites for assessment and gathers baseline information and evidence.
Stages 1, 2 & 6	**Prioritise**	Involves: removing sites from the process where there are reasons to suggest that sites are not reasonable options for allocation; creation of pools of sites, ordered by reference to a number of key and strategic criteria and then also adopting a sequential approach to determining which sites are recommended for allocation.
Stages 3,4,& 7	**Refinement & Challenge**	Technical assessments of sites against a range of criteria which helps. Sites are RAG rates against each criteria. Modelling and infrastructure planning tools are used to determine the cumulative impacts of sites packages. Sustainability Appraisal, HRA, HIA and EQiA all play a key role in testing and refining options.
Stage 5	**Testing The Need For Green Belt**	This involves pausing to assess whether on a settlement by settlement basis there is a justification for utilising Green Belt land to meet development targets. The exceptional circumstances test will be applied. The results of the Green Belt review – both strategic parcel assessments, and (if required) more detailed site assessments will be used to identify the most appropriate Green Belt sites.

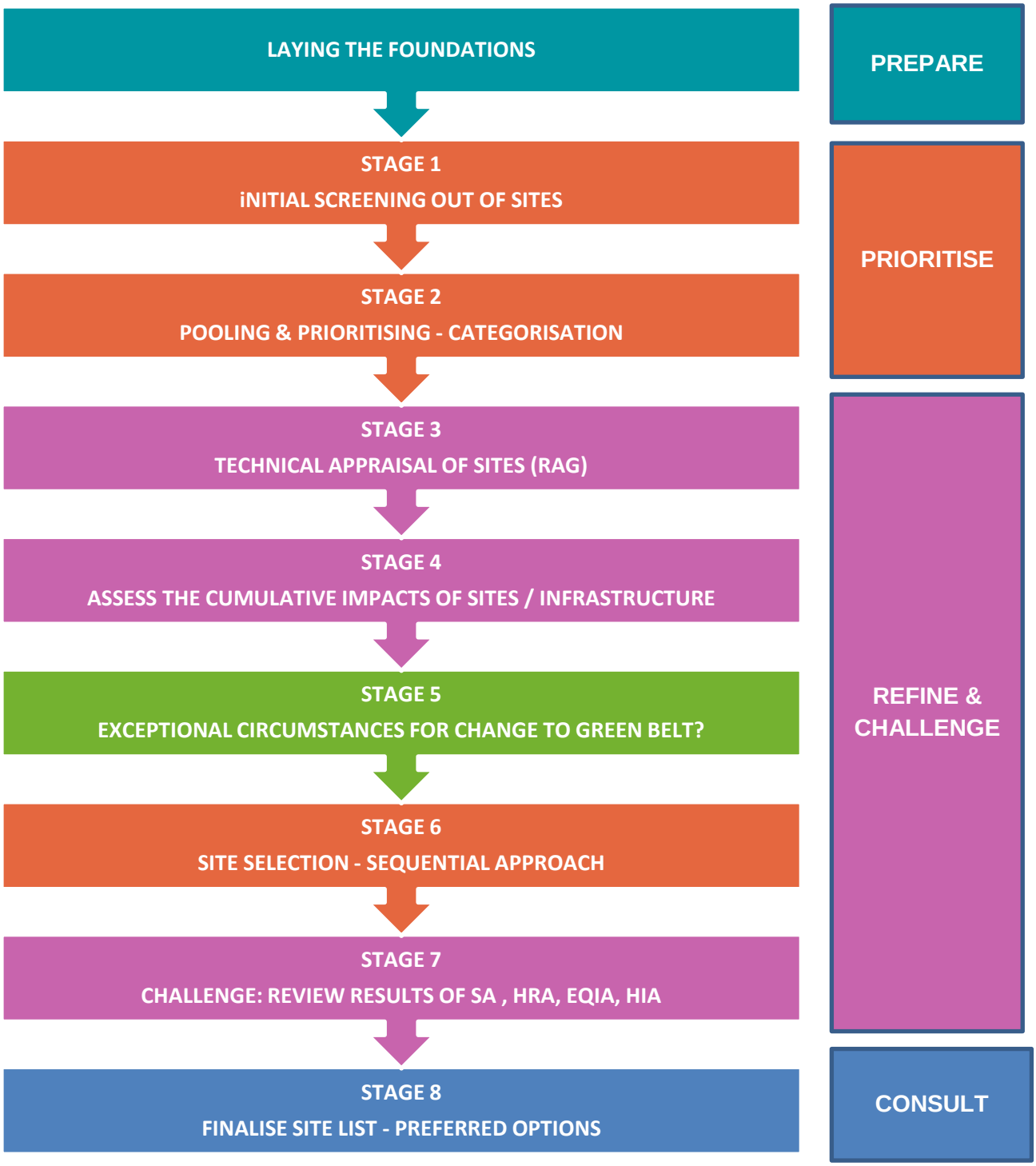
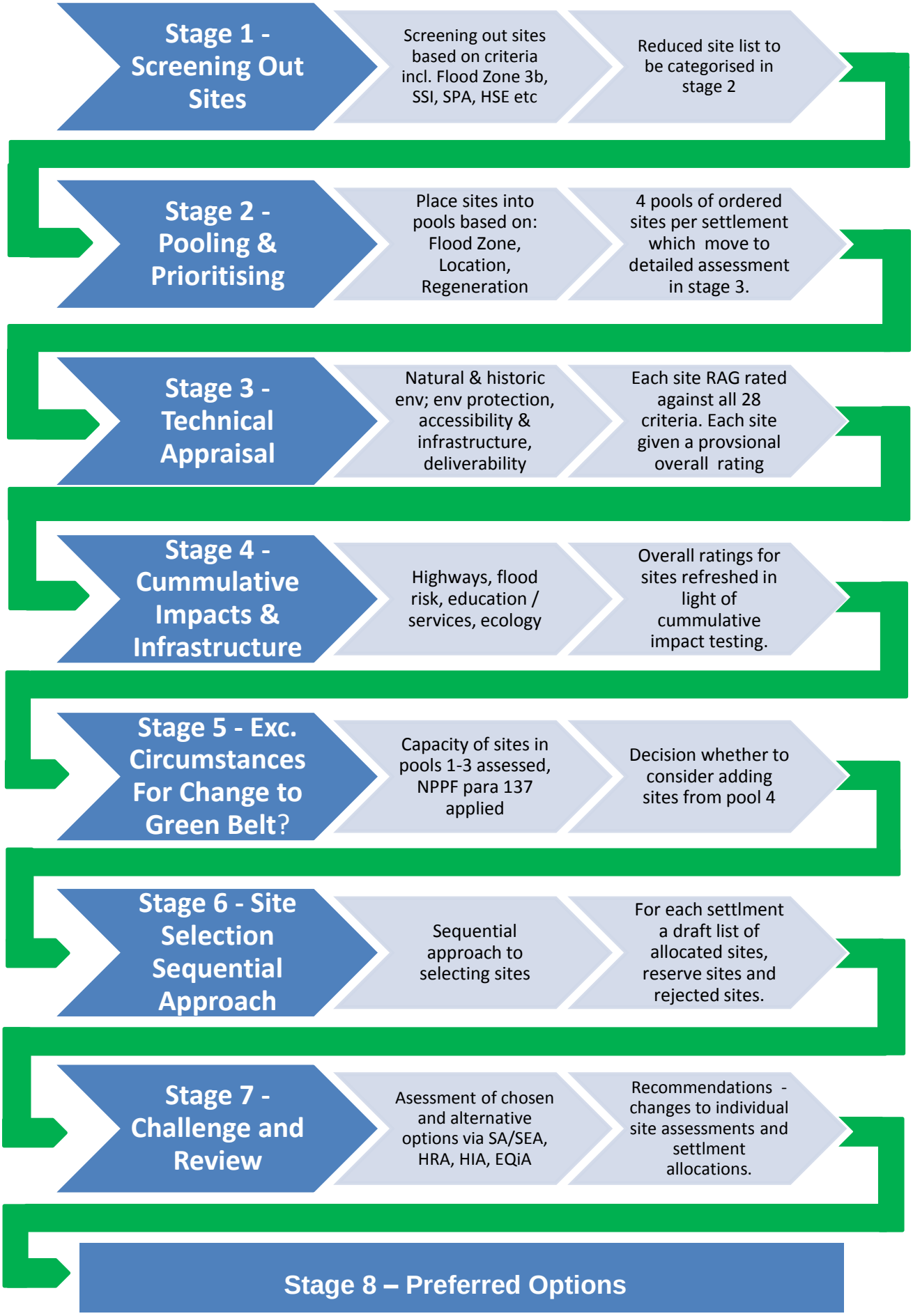


Figure 3.1: Overview of the site assessment process


Stage 1 - Screening Out Sites
Screening out sites based on criteria incl. Flood Zone 3b, SSI, SPA, HSE etc
Reduced site list to be categorised in stage 2
Stage 2 - Pooling & Prioritising
Place sites into pools based on: Flood Zone, Location, Regeneration
4 pools of ordered sites per settlement which move to detailed assessment in stage 3.
Stage 3 - Technical Appraisal
Natural & historic env; env protection, accessibility & infrastructure, deliverability
Each site RAG rated against all 28 criteria. Each site given a provsional overall rating
Stage 4 - Cummulative Impacts & Infrastructure
Highways, flood risk, education / services, ecology
Overall ratings for sites refreshed in light of cummulative impact testing.
Stage 5 - Exc. Circumstances For Change to Green Belt?
Capacity of sites in pools 1-3 assessed, NPPF para 137 applied
Decision whether to consider adding sites from pool 4
Stage 6 - Site Selection Sequential Approach
Sequential approach to selecting sites
For each settlment a draft list of allocated sites, reserve sites and rejected sites.
Stage 7 - Challenge and Review
Asessment of chosen and alternative options via SA/SEA, HRA, HIA, EQiA
Recommendations - changes to individual site assessments and settlment allocations.
Stage 8 – Preferred Options

4. Initial Screening Out of Sites

4.1 The Council are required to assess and compare reasonable alternative options. This stage therefore involves screening out any sites which are not reasonable or realistic options – where it is unlikely that development on that site is achievable. The main way to screen out such sites is to identify those which lie within designated areas and conflict with national planning policies which would automatically and unequivocally rule out development. The process of carrying out such screening begins with documents such as the SHLAA and will be refined and updated during the site assessment process.

4.2 The table below indicates the criteria which will be applied and which are considered to render sites unsuitable for allocation:

	Screening Criteria
Unsuitable	• Green Belt sites which are not adjacent and contiguous to the built up area and or could not reasonably form an acceptable urban extension. • Sites containing areas of international or national wildlife importance – SSSI's / SPA's / SAC's; or Class 1 Archaeological Area (unless only a small part of the site falls within the designated area and there is a reasonable prospect that mitigation measures could make development acceptable) • Sites within the defined Flood Zone 3b (the functional flood plain) except where only a small part of the site falls within the designated area and there is reasonable prospect that mitigation measures could make development acceptable • Sites in proximity to HSE designated major hazard sites or hazardous installations and which following further testing have been ruled unacceptable due to the level of risk from that installation given the proposed end use and the size of the potential development.

4.3 Sites will also be screened out where there are significant issues relating to land ownership and availability or very substantial physical constraints or viability issues and there are no realistic options for overcoming those constraints. [1]

4.4 It is possible that the status of such sites could change – for example changes to policy designations, changes in ownership circumstances etc. and therefore the potential to reinstate these sites into the assessment process will be kept under review. Some but not all of the information required for this screening process will come from the SHLAA and ELR and from monitoring.

[1] sites are normally retained on the Council's systems and background information on those sites is kept under review in case circumstances change which might warrant a change in assessment. For example land ownership and intentions might change and the boundaries of designated areas are sometimes changed. A key example here is flood risk zones which are regularly amended in response to updated data and new Strategic Flood Risk Assessments.

4.5 Any sites which are screened out will be added to a rejected sites table and included in a site selection background paper to be published at the next formal public consultation stage which is 'Preferred Options'.

Evidence Required At This Stage	Sites in the initial candidate list will be re-appraised taking account of updated information including that submitted by those promoting them. New sites will be assessed for their suitability, availability and achievability. This will involve site surveys, desk based GIS assessments, yield calculations and consultation (for example the SHLAA working group). Further studies including the Employment Land Review will also shape the revised list of candidate sites to be taken forward for more detailed appraisal.
Outputs	• A revised a shortened candidate list of sites on which further testing and assessment can be focused; • A list of rejected sites including reasons for rejection.

5. Pooling and Prioritising Categorisation

5.1 While there are a large number of criteria which could potentially affect a site's suitability for allocation there are a smaller subset which are of particular importance based on national policy within the NPPF and strategic policies within the Core Strategy. In order to ensure that these criteria are given sufficient weight the Council will use these criteria to place sites within 'pools' which will be accessed in sequence when searching for allocations on a settlement by settlement basis.

5.2 The criteria for this process will be:

- Which flood risk zone the site lies within;
- Location and PDL status including Green Belt;
- Regeneration priority – whether the site is in a regeneration priority area, or whether it is a site or area based initiative contained within the Council's Housing Delivery Action Plan or whether it has the potential to regenerate an area by reclaiming derelict land.

Flood Risk

5.3 As part of the sequential approach the Council will ensure that new development is steered to the areas with the lowest risk of flooding. In most cases sites within flood risk zone 3b will already have been screened out of the list of candidate sites (the only exceptions to this will be where sites and proposed uses fall within classifications where development within the flood plain is potentially acceptable – for example essential infrastructure which is compliant with the exception test and water compatible uses which include sand and gravel workings). Remaining sites will be grouped according to the flood risk zone in which they lie with first priority given to flood zone 1 sites and second priority to flood zone 2 sites etc.

Location Sequence (incl PDL Status)

5.4 Under this criteria which is based around Core Strategy Policy SC5, sites will be categorised as follows:

- First priority to the re-use of deliverable and developable previously developed land and buildings within settlements;
- Second priority to mixed green field / brown field sites within settlements
- Third priority to green field sites within settlements;
- Fourth priority to green belt releases.

5.5 The exception to this approach is for the urban extension at Holme Wood which has already been established within the adopted Core Strategy as a strategic priority and a location an urban extension. This will be categorised as a pool 1 site.

Regeneration

5.6 It is important that priority is given to the allocation of deliverable and developable sites which provide an opportunity to contribute to regeneration goals. Sites will therefore be assigned:

- category one status if within a Council regeneration priority area or within the Housing Delivery Action Plan;
- category two status if the site would secure the reclamation or improvement of a derelict, contaminated or unsightly site; and
- category three status if neither of the above apply.

The 4 Pools and Ordering Within Them

5.7 For each settlement, 4 tables of sites will be created corresponding to 4 pools.

5.8 Pools 1-3 will contain sites within settlements i.e. non green belt options. Green belt sites will be placed within pool 4 and will not be considered for allocation in the preliminary stages of assessment until and unless exceptional circumstances have been established, which includes assessing all non green belt options in pools 1-3 and also applying the tests of NPPF paragraph 137.

5.9 Pool 1 will comprise sites within flood zone 1 and then ordered by locational priorities 1-3, and regeneration category. Pool 2 will comprise sites within flood zone 2 ordered in the same way. Pool 3 will contain sites within flood zone 3a.

5.10 Pool 4 will contain Green Belt sites i.e. fourth priority in terms of locational priority. Site selection will utilise pool 4 only where it has been established that in order to meet the development targets for that settlement (or sub area in the case of employment), exceptional circumstances exist for changes to the green belt. Sites within pool 4 will be ordered according to flood zone to again ensure that options to utilise lowest risk areas are taken. The pooling table for Green Belt sites will include additional criteria relating to a sites green field / PDL status and on how the strategic parcel within which they lie has been assessed within the Green Belt Review. This Green Belt Review will grade strategic parcels as to whether they exhibit stronger or weaker performance against the 5 Green Belt purposes outlined in NPPF.

5.11 Strategic parcels are drawn quite widely and therefore their grading will not always provide a full picture of the suitability of a specific site and boundary change in green belt terms. For that reason significant weight will be given to the green belt RAG rating within the technical assessment which will be based on later stage of green belt assessment of the site rather than the wider parcel.

5.12 The split and ordering for sites within each pool will be as indicated in **Error! Reference source not found.** below.

Table 5.1 Pooling and Ordering of Site Lists for Each Settlement

POOL		ORDERED ACCORDING TO:

Sites Within Settlements		
POOL 1 ↓	Flood Zone 1 Sites	Location sequence, and regeneration priority
POOL 2 ↓	Flood Zone 2 Sites	Location sequence, and regeneration priority
POOL 3 ↓	Flood Zone 3a Sites	Location sequence, and regeneration priority
Sites Outside Settlement Boundaries		
POOL 4 ↓	Green Belt Sites	Flood risk zone then; Green Belt - Strategic Parcel Result. PDL / Greenfield status Regeneration Category

Evidence Required At This Stage	Core Strategy policy, the Council's Economic and Regeneration Strategies and land status derived from survey work and GIS / map based analysis. Also draws on flood risk mapping, the results of the SFRA level 1 report, and the results of the Green Belt Review assessments.
Outputs	For each settlement 4 separate pools or lists of sites will be generated ordered as indicated above.

6. Refinement

6.1 Having grouped and ordered sites according to priority criteria the Council will need to apply a further series of tests and assessments which will refine the emerging site choices – technical appraisals against potential constraints, cumulative impact testing and overarching appraisals such as SA and HiA.

Technical Appraisal of Sites

6.2 This stage will include the gathering of information and the carrying out of consultation with specialist services within the Council and with key external consultees.

6.3 The aim will be to assess each site against a range of issues and criteria designed to identify potential impacts and identify mitigation measures. Mitigation measures may then feed into policy requirements within the DPD or even additional land use allocations (for example for new open space, highways improvements, new schools provision etc.).

6.4 The criteria to be assessed are set out below and grouped according to theme. The themes and criteria to be used are summarised in Table 6.1 below.

Table 6.1: Summary of Themes and Lists For Technical Assessment

Natural & Historic Environment
Ecology / biodiversity / geodiversity
Priority habitats & Species
Ecological networks / corridors
Trees & woodland
Landscape & Visibility
Open Space & Green Infrastructure
Historic & Built Environment
Agricultural Land / Soils
Green Belt

Environmental Protection
Air Quality
Land Stability & Contamination
Former coal mining activity
Nuisance / Noise / Bad Neighbours
Major Hazard Sites & Hazardous Installations
Waste Management Sites
Mineral Sites
Surface water flooding
Water quality / source protection

Accessibility & Infrastructure
Accessibility Testing
Site Access
Local Road Network

Deliverability
Topography
Utilities - Pipelines & Cables
Viability & market demand

Utilities Capacity & Connections	Contaminated / derelict land / buildings
Local Services – Education, Health	Mineral reserves / safeguarding

6.5 In each case the key issue or questions which the assessment will consider is set out. Sites will be given a RAG rating (Red, Amber, Green) against each of these criteria. Table 6.2 provides a broad guide to how red, amber and green ratings will operate. Appendix 2 provides more detailed descriptions for how each criteria will be measured and rated and some of the information sources that will be used.

Table 6.2: RAG rating for site assessment

Green	Where there would be no adverse impacts or where there is reasonable expectation that impacts can be completely or substantially reduced or mitigated.
Amber	Where there is potential for adverse impacts but those impacts are can only be partially mitigated.
Red	Where there would significant adverse impacts with only limited or no reasonable prospect of mitigation.

Natural & Historic Environment

6.6 The individual criteria and key issues to be addressed under this heading are set out below. As already indicated appropriate account will be taken of the potential to manage, mitigate or remove any identified impacts:

Criteria	Key Issue
• **Ecology, biodiversity, geodiversity**	Would development of the site be likely to result in any adverse impacts for a site designated as being of importance for its ecological, biodiversity or geodiversity value?
• **Priority habitats & species**	Do records show the presence of priority habitats or priority species on or near the site?
• **Ecological networks / corridors**	Would development of the site be likely to result in any adverse impacts for an ecological network or a wildlife corridor?

• **Trees & woodland**	Would development of the site be likely to result in the loss of trees, hedgerows or shrubs protected by a TPO or by the Hedgerows Regulations (1997)
• **Landscape & Visibility**	In the context of the landscape character type in which the site is situated, how would development of the site for the proposed use be likely to impact on the wider landscape. How visible is the site from public vantage points i.e. roads, railways lines and public rights of way?
• **Open Space & Green Infrastructure**	Would development of the site be likely to result in the loss of designated (formal or informal) open space including, urban and village greenspace, allotments and playing pitches? What is the significance of any loss in relation to local availability, standards and the potential to mitigate losses through quantitative and qualitative improvements?
• **Historic & Built Environment**	Would development of the site be likely to result in any harm to the character, appearance, archaeological and historic value and significance of a heritage asset (designated or undesignated), and their setting (e.g. listed buildings, scheduled monuments, conservation areas, townscape features, archaeological remains etc.)
• **Agricultural Land / Soils**	Would development of the site be likely to result in the loss of agricultural land in particular the best and most versatile agricultural land?
• **Green Belt**	Would the development of the site result in the loss of Green Belt and if so could the resultant change in green belt be achieved without significant harm to the local and strategic functioning of the green belt?

Environmental Protection

6.7 The individual criteria and key issues to be addressed under this heading are set out below. As already indicated in all cases account will be taken of the potential to manage, mitigate or remove any identified impacts :

• Criteria	• Key Issue
• **Air Quality**	Does the site lie within or in close proximity to a significant source of air pollution or within an area of poor air quality or a designated Air Quality Management Area (AQMA)?
• **Land Stability**	Is the site subject to any land stability issues? Are there any potential adverse impacts arising from on-site structures, unstable land, culverted watercourse etc.?
• **Former coal mining activity**	Is the site potentially affected by former coal mining activities?
• **Nuisance / Noise / Bad Neighbours**	What is the potential for adjacent land uses to constrain the type of uses that could potentially occupy the site? (i.e. in terms of noise and light pollution etc.)
• **Major Hazard Sites & Hazardous Installations**	• Does all or part of the site lie within one of the defined zones around a major hazard site or hazardous installation?
• **Waste Management Sites**	Is this site located within close proximity to operational waste management sites? Could development impact on the operation of waste sites?
• **Mineral Sites**	Is the site located within 500m of operational mineral extraction sites? Could development impact on the operation of the site? Would the mineral operation impact on future development?
• **Drainage - Surface flooding**	What is the likely risk and extent of surface water flooding on the site?
• **Water quality / source protection**	Is there any evidence of groundwater or aquifers on the site, or is the site within a drinking water source protection zone? Could development potentially affect any abstraction of groundwater intended for human consumption?

Accessibility & Infrastructure

6.8 The individual criteria and key issues to be addressed under this heading are set out below. As already indicated in all cases account will be taken of the potential to manage, mitigate or remove any identified impacts :

• Criteria	• Key Issue
• **Accessibility Testing**	Is the site accessible to services and public transport and does it meet the standards set out in Core Strategy Appendix 3?
• **Site Access**	Is there a suitable point of vehicular access into the site? Would such an access require any improvements to achieve requirements such as visibility splays? Is the site subject to any ransom strips?
• **Local Road Network**	What is the capacity of the local road network to cope with the proposed development? Would any off site highways / junction improvements be required?
• **Utilities Capacity & Connections**	Are any infrastructure works required to provide adequate connections to essential utilities (water supply, sewage, drainage, electricity, gas, telecoms). Are there any significant existing infrastructure capacity constraints which will require addressing by providers?
• **Local Services – Education, Health**	Are there any significant existing deficiencies in the capacity of local schools and health services which need addressing?

Deliverability

6.9 The individual criteria and key issues to be addressed under this heading are set out below. As already indicated in all cases account will be taken of the potential to manage, mitigate or remove any identified impacts :

• Criteria	• Key Issue
• **Topography**	Will the topography of the site lead to a reduction to the net developable area, or require engineering solutions that will constrain the size and shape of the plots / plateau available for development.
• **Utilities - High pressure gas pipelines / overhead**	Is any part of the site within the buffer zone of high pressure gas pipeline (150M) or overhead or underground

or underground cables	electricity cables?
• **Viability & market demand**	Is the site in an area of strong or weak market demand and viability?
• **Mineral reserves / safeguarding**	Does the site lie within 500m of an existing active minerals extraction site or within a minerals safeguarding area? Would development be likely to lead to the sterilisation of an economically significant mineral resource?
• **Abnormal Site Costs**	Would development of the site require addressing any abnormal site issues for example remediating land stability, contaminated land, derelict land / buildings

Evidence Required At This Stage	The Council will consult with specialist teams within the Local Authority including drainage, highways development control conservation, and will work with key external bodies.
Outputs	Each site will have a RAG rating against each criteria and these assessments will have produced a draft list of potential design and mitigation elements for inclusion in either the policy for that site or supporting text.

Cumulative Impacts & Infrastructure

6.10 As work progresses and the process of refining the site assessments reaches a more advanced stage, the Council will be able establish an initial list of site allocations for each settlement. This will allow further testing of cumulative impacts to be meaningfully assessed.

6.11 The previous stages will have resulted in a preliminary list of potential development sites allocations based broadly on looking at the impacts of each site individually. This stage will assess:

- Whether the cumulative or in combination effects of the proposed sites raise significant issues not apparent within individual site appraisals;
- What the nature of those additional impacts are;
- Whether an alternative package of sites might be capable of reducing or removing those impacts;
- What mitigation or management measures might be required and in particular what infrastructure improvements might be required.

6.12 The cumulative assessments may therefore require land to be allocated or reserved for new infrastructure or specific design, infrastructure or mitigation requirements to be written into site policies.

6.13 The cumulative impact assessments will focus on:

- The Local and strategic highway network informed by updated transport modelling and key corridor based studies;
- Flood risk informed by a Level 2 Strategic Flood Risk Assessment;
- Education capacity and other service requirement;
- Wildlife impacts in particular relating to the South Pennines SPA / SAC

6.14 This stage will also be a key stage for revising and adding to the Local Infrastructure Plan.

6.15 As a result of the cumulative impact assessments the proposed list of site allocations in each settlement may be amended or may be retained unaltered.

Green Belt Exceptional Circumstances and NPPF Para 137

6.16 By the time the Council reach stage 5 of the site assessment process a clear picture of the site choices available within each settlement will have been established.

- A comprehensive site search and extensive database of all reasonable site options will have been compiled;
- Sites with little chance of being considered suitable due to fundamental conflicts with national and local policies will have been screened out along with sites considered unlikely to be developable due to land ownership or other constraints;
- Sites will have been assessed, ordered and prioritised against key criteria to ensure that flood risk is minimised and the requirements of the sequential approach to flood risk has been applied, to ensure that sustainable locations and brownfield sites are prioritised in line with Core Strategy Policy SC5 and to pick out and prioritise sites capable of contributing to regeneration objectives.
- Extensive information and technical appraisals will have been carried out producing RAG ratings against a range of criteria thus refining the picture of which sites are most appropriate for allocation

6.17 Combining the assessments above, and other background evidence including the Bradford Growth Assessment and the Green Belt Review, the Council will be able to look at the potential yields of development land using data from the SHLAA and ELR and make an informed assessment based on the tests within NPPF paragraph 137 as to whether exceptional circumstances exist for changes to the Green Belt in each settlement. At this stage, should those circumstances exist, sites from pool 4 i.e. potential Green Belt sites will be considered for allocation.

6.18 In addition, if the Council consider that exceptional circumstances do exist to make changes to the green belt around a given settlement, its choice of which green belt sites to allocate will need to accord with the considerations set out within NPPF paragraph 138 relating to the promotion of sustainable patterns of development. This means assessing, for the settlement concerned and having regard to reasonable site options, the potential to channel development towards:

- urban areas inside the Green Belt boundary,
- towns and villages inset within the Green Belt or
- locations beyond the outer Green Belt boundary. and
- give first consideration to land which has been previously-developed and/or is well-served by public transport.
- And the potential for offsetting the impact of removing land from the Green Belt through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Evidence Required At This Stage	**Highways** - The Council have commissioned an update to its transport model to assess the cumulative impacts of site proposals, identify potential problems and identify infrastructure improvements required to support development. **Flood risk** – the Council will complete an update to its Level 1 Strategic Flood Risk Assessment in co-operation with the Environment Agency and will commission a Strategic Flood Risk Assessment Level 2 to focus in on sites and areas which have greatest potential to be subject to flooding should the sequential approach and land supply constraints reveal the need to go beyond flood risk zone 1. This will integrate an analysis of all sources of flooding including surface water. **Education** - the Council's Planning Service will continue to work with the Council's Education Planning teams to assess current capacity issues and the impacts of initial proposed site packages on future capacity with a view to identifying any requirements for new sites. **HRA** - The Council will have commissioned a Habitats Regulations Assessment. This will be informed by further work, evidence and the requirements set out under Core Strategy Policy SC8.
Outputs	A series of cumulative impact assessments which may in turn lead to a refined and amended list of potential site allocations for each settlement.

Draft Site Selection – Sequential Approach

6.19 By this point in the assessment process the Council will have established for each settlement:

- A list of sites candidate sites grouped into pools and ordered according to key priorities;
- A set of technical assessments which RAG rate each site against 28 detailed criteria;
- Cumulative impacts assessments and potential infrastructure requirements.

6.20 Using planning judgement and by combining all of the information the Council will assign each site one of the following ratings:

- Green – for strongly performing sites which are proposed as allocations;
- Amber – for moderately performing sites are not proposed for allocation and which perform less well than green sites;
- Red – for rejected and weakly performing sites. These red sites will join sites which have already been screened out and categorised as rejected sites from stage 1.

6.21 The Council will arrive at its proposed allocations on a settlement by settlement basis by reference to the relevant Core Strategy development targets and application of an element of additional allocation to ensure flexibility of supply to allow for unforeseen circumstances which may lead to non implementation of some sites.

6.22 It will firstly give priority to the allocation of pool 1 sites by assessing the contribution and yields which could be achieved from strongly performing sites within those pools. There will be instances where pool 1 sites are not selected because they have performed poorly against one or more of the technical assessment and RAG rated criteria. If there are insufficient sites within the first pool to achieve the required development targets the Council will move sequentially to pool 2 sites and so on.

6.23 As can be seen above the pooling and prioritisation process will not be used to rule any sites out and will not on its own determine whether a site is identified for allocation or rejected. Nor will a site's inclusion in pools 2-4 necessarily rule out their allocation. **The suitability of a site's allocation for a particular use will be dependent on a combination of the pooling process, the further refinement tests identified within in stages 3, 4, 5, and 7 and the application of any use specific criteria (see section 8).**

6.24 In making its final site selection recommendations the Council will also ensure that account is also taken of other factors such as the need to ensure a range and choice of sites, site phasing and the need to take account of the timing / expected delivery on sites and delivery of key infrastructure.

Challenge and Review - Options Testing & Appraisal

6.25 There are a number of further assessments and processes which are key to ensuring either that inappropriate options are ruled out or that the Local Plan has proposals which represent an appropriate strategy given the reasonable alternatives which have been identified.

6.26 Although these tests conclude with formal reports which are published at consultation stages they are not carried out at the end of the process but are in most cases developed in an iterative fashion through the period where site options are being tested and refined.

6.27 These processes and assessments are

- Sustainability Appraisal (incorporating Strategic Environmental Assessment)
- Habitats Regulations Assessment
- Viability Assessment
- Equalities Impacts Assessment
- Health Impact Assessment

Sustainability Appraisal / Strategic Environmental Assessment– SA / SEA

6.28 In line with section 19 of the Planning & Compulsory Act (2004) the Council's site selections within its Local Plan will be informed by the results of a sustainability appraisal. Although sustainability appraisal is listed as stage 9 in reality the sustainability appraisal process will start much earlier and affect the plan's content in an iterative fashion throughout the stages of its preparation. However this will be a key stage as it will see the completion and publication of a full SA report. Earlier SA work will have included scoping and use of the SA to ensure that the right criteria and impact tests have been carried out with particular reference to stages 3, 4 and 8.

6.29 The Government's Planning Practice Guidance describes an SA as a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate taking into account the reasonable alternatives.

6.30 Alongside the SA process, the European Strategic Environmental Assessment (SEA) Directive[3] requires EU member states to carry out environmental assessment on the preparation of the land use plans.

6.31 As far as the later stages of the site assessment methodology are concerned the SA will have several key roles:

- firstly in ensuring that sites have been assessed and rated correctly against the RAG ratings given the available baseline information;

- secondly whether there are any aspects of a sites performance against the key SA criteria which have not been picked up by the Council's site assessment; and
- thirdly whether the Council have reached a reasonable conclusion on the choices made within a settlement, whether it has chosen to allocate the right sites and clusters of site's;

6.32 The key stages of the SA process and which will be followed by the Council are set out in a diagram within the PPG, reproduced in the diagram below:

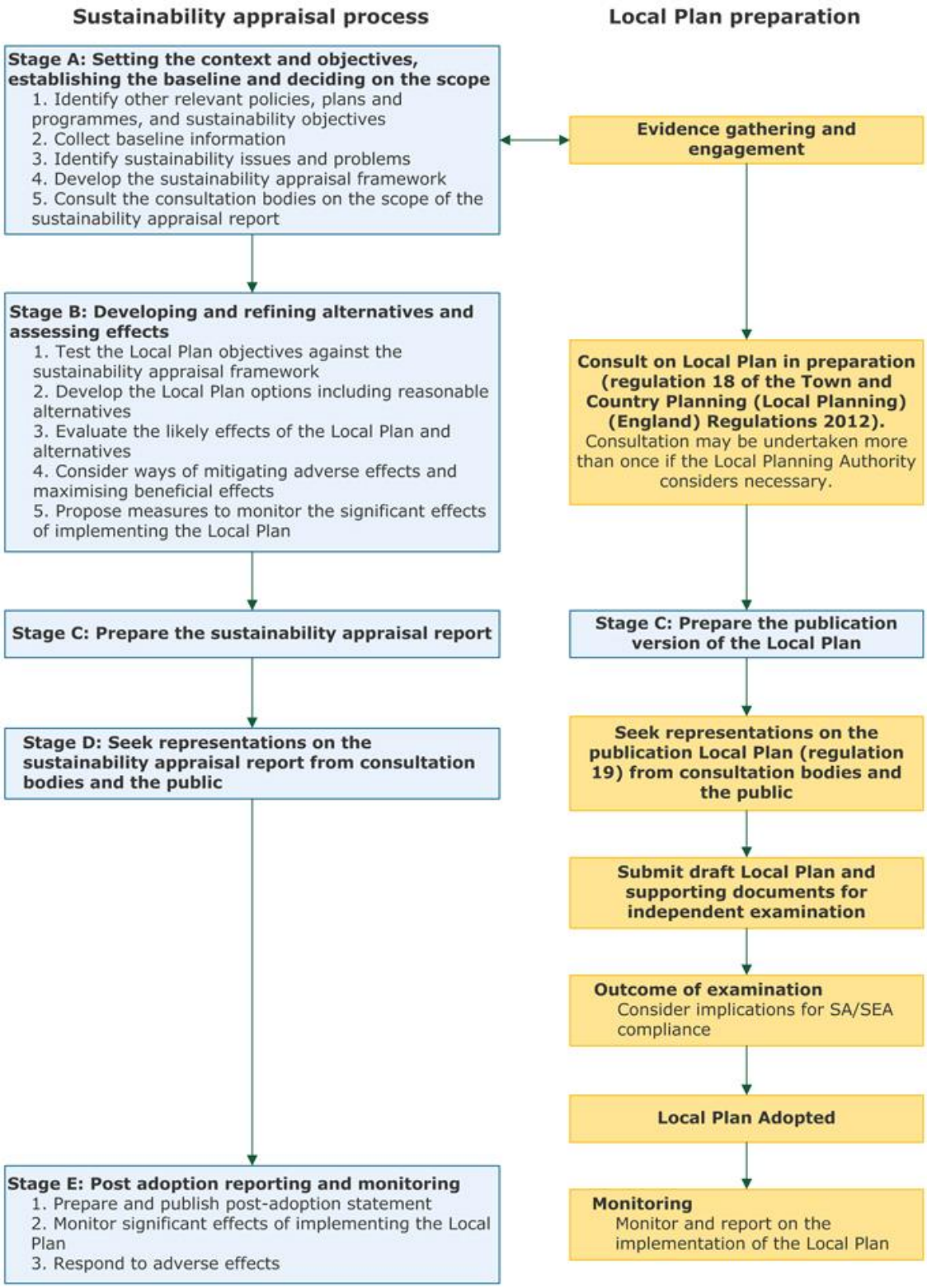
Habitats Regulations Assessment (HRA)

6.33 A further integral part of preparing the Allocations DPD is undertaking a Habitats Regulations Assessment (HRA) to ensure that the Plan does not lead to adverse effects on the ecological integrity of internationally important habitats or species assemblages within or close to the district.

6.34 HRA is a requirement of the Conservation of Habitats and Species Regulations 2010 (as amended; commonly referred to as 'the Habitats Regulations'), and must be applied to any plan or project in England and Wales with the potential to adversely affect the ecological integrity of any sites designated for their nature conservation importance as part of a system known collectively as the Natura 2000 network of European sites. The relevant area in this case is the South Pennines Special Protection Area (SPA) and South Pennines Special Area of Conservation.

Equalities Impact Assessment (EQiA)

6.35 The purpose of the Equality Impact Assessment (EqIA) is to ensure that equality is placed at the centre of policy development and will help to identify the likely impact of the Local Plan on the District's communities. The EqIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group. Undertaking an equality assessment also fulfils the legal duties placed upon the Council in a transparent manner.


Sustainability appraisal process
Local Plan preparation
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework
5. Consult the consultation bodies on the scope of the sustainability appraisal report
Evidence gathering and engagement
Stage B: Developing and refining alternatives and assessing effects
1. Test the Local Plan objectives against the sustainability appraisal framework
2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan
Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).
Consultation may be undertaken more than once if the Local Planning Authority considers necessary.
Stage C: Prepare the sustainability appraisal report
Stage C: Prepare the publication version of the Local Plan
Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public
Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public
Submit draft Local Plan and supporting documents for independent examination
Outcome of examination
Consider implications for SA/SEA compliance
Local Plan Adopted
Stage E: Post adoption reporting and monitoring
1. Prepare and publish post-adoption statement
2. Monitor significant effects of implementing the Local Plan
3. Respond to adverse effects
Monitoring
Monitor and report on the implementation of the Local Plan

6.36 The link between how an area is planned and developed, and the health and wellbeing of its population has long been established. It is essential that the site assessment process understands and takes into account the potential impacts which choices may have on health and also the role for plans and proposals to produce positive outcomes. As outlined above there are a vast range of criteria which will feed into site selection process which can ensure that this is the case, ranging from assessing and avoiding impacts on open space, allocating sites in locations accessible to services and public transport, assessing impacts on traffic and air quality etc.

6.37 A Health Impact Assessment (HIA) is a useful additional tool that helps to ensure that health and wellbeing is being properly considered in planning policies and proposals. HIAs can be done at any stage in the development process, but are best done at the earliest stage possible. It is intended that the HIA will be a live document, which runs alongside the Core Strategy Partial Review and the Allocations DPD allocations work and is updated as the plans progress.

7. Developing Draft Site Lists and Establishing The Most Appropriate Use

7.1 Based on the information and assessments described above officers will make a preliminary assessment of the most appropriate use or uses for each candidate site. In most cases sites will have been submitted to the Council or will have gained planning permission for a specific use. If a site is not considered appropriate for the use advocated in a call for site submission the Council will consider whether it has potential for other uses and where relevant discuss alternative options with agents or land owners.

7.2 For residential use the Council will seek to ensure that a site would offer a reasonable living environment but also look to avoid residential allocations which would undermine other uses such as waste sites. It will also be mindful of the need to avoid the dilution of employment zones which benefit from clusters or concentrations of businesses or employment uses in close proximity. Certain uses require specific locational requirements and these will also be taken into account in determining favoured uses.

7.3 The assessment process will require draft lists of site allocations to be drawn up for each settlement at several stages - for example following stage 3, having placed sites in prioritised pools and having carried out technical assessments of sites and RAG rated them against various criteria. This will allow an assessment to be made of the cumulative impacts of the initial package of sites and whether any alternative configuration would produce better outcomes. If this is the case then that initial site list will be amended.

8. Use Specific Criteria & Specialist Uses

Employment

8.1 The Allocations DPD is tasked with identifying and allocating at least 135ha of employment land within the district and in accordance with Core Strategy Policy EC3 these allocations will be apportioned as follows:

- 100ha within the City of Bradford
- 30ha within the Airedale Corridor
- 5ha within the Wharfedale corridor

8.2 All candidate development sites will be assessed for their suitability as employment allocations and be assessed in line with the stages above. However employment sites require more specific locational attributes and must normally be in places accessible to the strategic highway network and attractive to modern end users. The Council will therefore develop some further employment specific criteria to ensure that attractive and deliverable sites are identified. Some of the potential criteria which may be used are listed below. This provisional list is based on emerging work from the Council's Employment Land Review which is currently underway:

- Location & Planning History
- Environmental Constraints – incl green belt, other environmental designations, flood risk;
- Site Access
- Accessibility – to airport, rail, bus, road network
- Market Assessment:
  - Commentary on existing employment provision
  - Market significance
  - Marketability
  - Evidence of existing developer / occupier interest in the land
  - Length of time the site has been allocated (if applicable)
  - General market history
  - Other market intelligence

Any constraints on availability, suitability or viability & prospects the site being developed Travellers and Showpeople

8.3 Government planning guidance indicates that Local Plans should reflect the overarching aim to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

8.4 An update to the assessment of the accommodation needed for these communities is being carried out as part of the CSPR. This will result in an update to Policy HO12 of the Core Strategy which currently states that the Council will make provision via policies and site allocations to deliver at least:

- 39 pitches for the gypsy and traveller communities;
- 7 pitches for transit accommodation;
- 45 pitches for travelling showpeople.

8.5 The Core Strategy indicates that the Council will work closely with neighbouring Council's, the traveller and showperson's communities and the settled community to identify the most appropriate sites which will offer locations and accommodation which is both sustainable and meet the needs of travellers and showpeople.

8.6 With this in mind the guidance which is contained within this document for the assessment of sites should be seen as a starting point and will be modified and added to as plan preparation continues based on feedback from the community.

8.7 In particular the Council will consult with Traveller and Showperson's Groups to further develop the site assessment methodology, look to see whether areas of search should be identified for site search which would focus sites on areas of need and demand and provide feedback on the type and size of sites which are favoured.

8.8 The majority of the criteria which are used to assess the suitability and attractiveness of sites for settled accommodation use will be equally applicable to the selection of traveller sites. However based on the factors identified within the Core Strategy and evidence from elsewhere within the region there are a number of factors which are of particular importance and which will be central to the site assessment process:

- Just as for standard residential sites the Council will assess sites sequentially based on location and, greenfield / previously developed land status
- Sites should be judged to be deliverable or developable and available for the intended use;
- Sites should be capable of safe access;
- Account will be taken of the impact on vehicular movements on the local highway network. For Travelling Showpersons' sites, sites will need to be capable of safely accommodating equipment and the movement of large vehicles / HGV's;
- Sites should avoid significant harm to environmental assets and will therefore be RAG rated accordingly;
- There will be a particular emphasis and weighting on the accessibility of pitches and plots to public transport, health care, schools, shops, and local services.
- Pitches and plots should not be located on land that is deemed unsuitable for general housing, such as land that is contaminated, adjacent to bad neighbour uses, landfill sites, heavy industry or electricity pylons.

- Pitches and plots should avoid zones of high flood risk (zone 3) - flood risk is a key consideration when assessing the suitability of potential Traveller sites given the vulnerability of residential caravans.

8.9 It is important that the size, type, location and design of sites reflects the needs of the community and in line with national planning policy promotes peaceful and integrated co-existence between the site and the local community. While sites should be located in close proximity to existing settlements and communities it is important that the amenity and environment of local residents is protected and the need for traveller families to feel safe and enjoy privacy is met. It will not normally therefore be appropriate for example for small traveller sites to be located within settled housing estates.

8.10 In terms of site size, previous but now withdrawn government guidance indicated a maximum site size of 15 pitches for traveller sites. However it may be that a spread of sites smaller than this but capable of accommodating extended family groups (requiring a minimum of 3-4 pitches) will be appropriate. Sites will need to be large enough to accommodate amenity buildings, and facilities such as lockable sheds for bicycles etc, garden areas.

8.11 Sites for showpersons will need to be larger reflecting the fact that their needs relate to their employment and the storage and movement of large vehicles and equipment.

Elderly / Care / Assisted Living

8.12 The Council has received representations at Issues and Options stage to indicate that sites for elderly, sheltered and extra care accommodation require a number of attributes. Those attributes which ensure maximum potential for residents to maintain an independent lifestyles and also ensure accessibility for visitors take into account the location criteria recommended in the Joint Advisory Note of the National House Builders' Federation and the National Housing and Town Planning Council entitled – 'Sheltered Housing for Sale' (2ND Edition – 1988). Whilst this related to sheltered housing, the same principles apply to extra care and Category II accommodation.

8.13 The five location criteria identified are Topography, Environment (including safety and security), Mobility, Services and Community Facilities. Locations should be within easy reach of a shopping centre, public transport and other essential services, all of which contribute to the residents maintaining an independent lifestyle.

Minerals

8.14 As part of preparing the Site Allocations DPD, the council will need to consider any sites or areas of search put forward for future mineral extraction as well as reviewing those allocated in previous plans. In addition to the other criteria outlined in this methodology, there are a number of specific matters that will need to be taken into account. In most cases this information that should be provided by site promoters in the case of new sites. These are:

- Mineral Type (sand and gravel; sand; sandstone; oil/gas; coal)
- Indication of Resource (Million Tonnes)
- Site Type (New site; Existing site; Extension)
- Estimated Working Lifespan (Years)
- Deliverability with Plan Period (2020 to 2037)
- Evidence of Availability of Resource

9. Next Steps

9.1 The Council are working towards publishing and consulting on a 'Preferred Options' document later in 2019. This will provide, for each settlement, a package of proposed sites and designations including any proposals for supporting infrastructure.

9.2 The Council will publish a range of evidence and background papers in support of the Preferred Options. Information will be placed on the Council's Planning Policy web pages at the address below:

https://www.bradford.gov.uk/planning-and-building-control/planning-policy/planning-policy/

10. Appendix 1 : Core Strategy Public Transport Accessibility Standards and Travel Time Heat Mapping

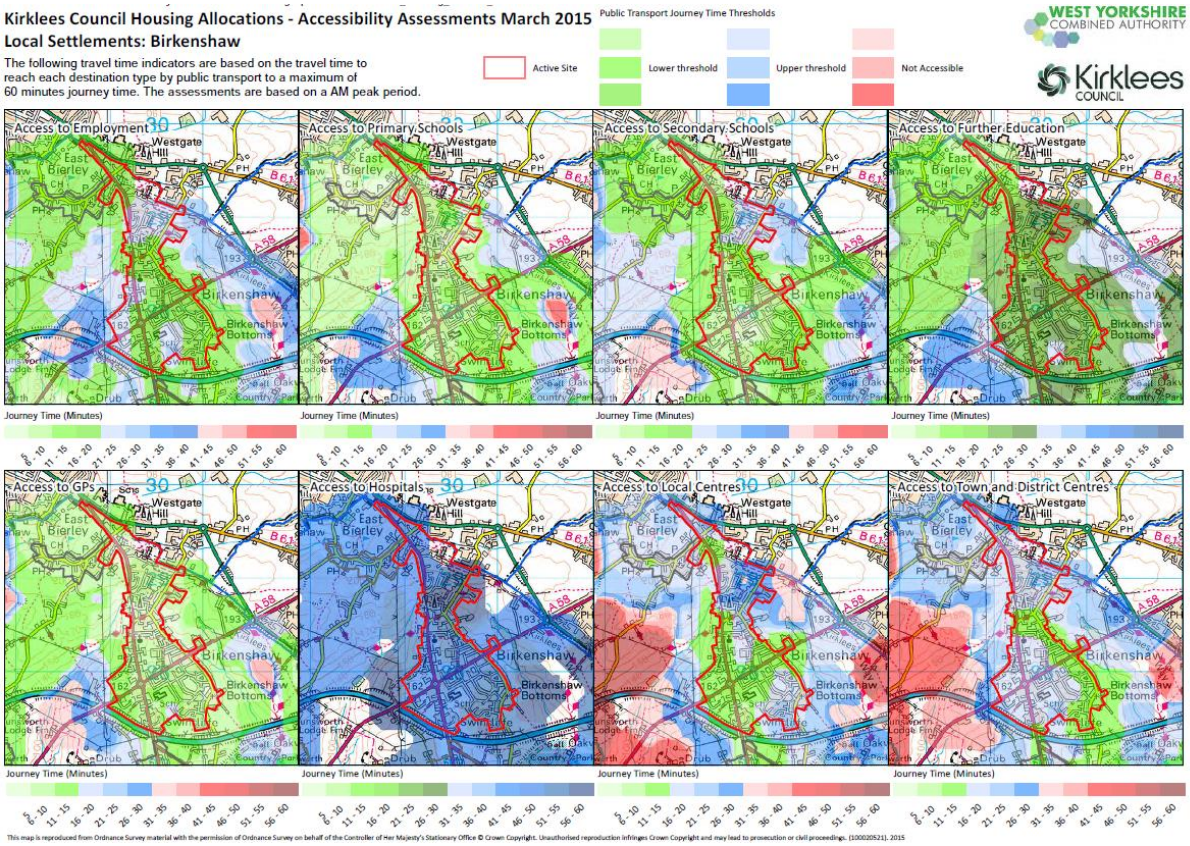
Table 1: Accessibility Standards for Employment and Social Infrastructure Uses

	Employment	Primary Health / Education	Secondary Health / Education	Leisure, Retail and Other
Sites located in Bradford Urban Area or extensions to the urban area (Regional Cities, Principal Towns & Local Growth Centres) should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*
Sites located in Local Service Centres should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*

Table 2: Accessibility Standards for Housing and Mixed Use Developments (that include residential)

	To Local Services	To Employment	To Primary Health / Education	To Town Centres / City Centres
Sites located in Bradford Urban Area or extensions to the urban area (Regional Cities, Principal Towns & Local Growth Centres) should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre* Or 10mins walk time (800m)	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre* Or 20mins walk time (1600m)	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*
Sites located in Local Service Centres should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre* Or 10mins walk time (800m)	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre* Or 20mins walk time (1600m)	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*

The Council will work with the WYCA to produce accessibility heat maps for each settlement. These maps will show public transport travel times to 8 key services and facilities. An example of the maps produced for Kirklees is provided below:



A summary table, similar in style to that below, will indicate how accessible each site is to these services and facilities.

	TRAVEL TIME TO							
	Empl	**P School**	**Sec School**	**F. Ed**	**GP's**	**Hosp**	**Local / District Centre**	**City / Town Centre**
Site A								
Site B								
Site C								
Site D								
Site E								
Site F								
Site G								

11. Appendix 2 : Technical Assessment : RAG Rating Specifications

CRITERIA		RAG RATING SPECIFICATION			ADDITIONAL INFORMATION
Ref	Issue	Green	Amber	Red	Notes & Links
NATURAL AND HISTORIC ENVIRONMENT					
	Ecology, biodiversity, geodiversity Would development of the site be likely to result in any adverse impacts for a site designated as being of importance for its ecological, biodiversity or geodiversity value?	Either The site would not have any adverse impacts on such sites or any impacts could be completely or substantially reduced or mitigated.	The site would have impacts on such designated areas where impacts could only be partially mitigated.	The site would have significant adverse impacts with limited or no reasonable prospect of mitigation	NPPF paragraphs 170-171 and 174-177 NPPG at: https://www.gov.uk/guidance/natural-environment#biodiversity-and-ecosystems Core Strategy Policy EN2
	Priority habitats & species Do records show the presence of priority habitats or priority species on or near the site?	No there are no such species or habitats.	Yes but impacts can be partially mitigated via site design, layout or off site compensatory improvements.	The site would have significant adverse impacts with limited or no reasonable prospect of mitigation	Information and data inputs will include from internal biodiversity team, the West Yorkshire Ecology Service, and any surveys within submitted master plans. https://www.wyjs.org.uk/ecology/ NPPF para 174

CRITERIA		RAG RATING SPECIFICATION			ADDITIONAL INFORMATION
Ref	**Issue**	**Green**	**Amber**	**Red**	**Notes & Links**
	Ecological networks / corridors Would development of the site be likely to result in any adverse impacts for an ecological network or a wildlife corridor?	The site does not lie within or in close proximity to such networks or corridors or where a site does lie in such a location any impacts can be completely or substantially reduced via on or off site design or improvements.	The site lies within or in close proximity to such a location and there would be impacts which could only be partially mitigated.	The site would have significant adverse impacts with limited or no reasonable prospect of mitigation.	See above.
	Trees & woodland Would development of the site be likely to result in the loss of trees, hedgerows or shrubs protected by a TPO or The Hedgerow Regulations 1997	Either there are no protected trees, shrubs or hedgerows or where there are such features, there is a reasonable prospect that the design and layout of the development could allow for retention or enhancement of those features.	The site would have adverse impacts which could only be partially mitigated i.e. there would be a partial loss of such features	The site would result in the loss of features and there would significant adverse impacts with only limited or no reasonable prospect of mitigation.	NPPF para 170 & 175 Core Strategy Policy EN5 Hedgerow https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management regulations: https://www.cpre.org.uk/resources/countryside/hedgerows/

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	Landscape & Visibility In the context of the landscape character type in which the site is situated, how would development of the site for the proposed use be likely to impact on the wider landscape. How visible is the site from public vantage points i.e. roads, railways lines and public rights of way?	Either no or limited adverse impacts are identified, or there is reasonable expectation that impacts can be completely or substantially mitigated via design and layout. or where development could actually enhance landscape character.	The site would have adverse impacts which could only be partially mitigated.	The site would cause significant adverse impacts in a landscape area which is highly sensitive to change with limited or no reasonable prospect of mitigation.	NPPF para 170 Core Strategy Policy EN4 NPPG see: https://www.gov.uk/guidance/natural-environment#landscape Bradford Landscape Character Assessment SPD: https://www.bradford.gov.uk/planning-and-building-control/planning-policy/landscape-character-assessment-supplementary-planning-document/ National Character Area Profiles at: https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-yorkshire-and-the-humber
	Open Space & Green Infrastructure Would development of the site be likely to result in the loss of designated (formal or informal) open space*? What is the significance of any loss in relation to local	Either : The sites development could lead to enhancement in open space provision through	The site would result in the loss of open space which could only be partially mitigated but it lies within a location where the loss would not result in a	The site would result in the significant loss of open space with limited or no reasonable prospect of mitigation. Losses would either cause a deficiency in open	**NPPF paras 96-97 & 171** **NPPG at:** **https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-**

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	availability, standards and the potential to mitigate losses through quantitative and qualitative on or off site improvements?	new or improved spaces; or the site's development would not result in the loss of any open space or GI; or any loss which would occur could be completely or substantially mitigated in line with Core Strategy Policy EN1A.	deficiency in the area.	space in the area or exacerbate an existing deficiency.	**sports-and-recreation-facilities** **and https://www.gov.uk/guidance/natural-environment#para027** **Core Strategy Policy EN1 and SC6** ***** Open Space typologies within the RUDP include urban and village greenspace, allotments and playing pitches however these typologies are being reviewed within the Open Space Assessment along with standards for provision.
	Historic & Built Environment Could development of the site be achieved in a way which conserves and where appropriate enhances the heritage significance and setting of the district's designated and undesignated heritage assets .	The site does not affect any such heritage asset; or Development could have an impact on heritage assets but design and mitigation would enable the requirements of Core Strategy EN3 to be met such that the heritage	The site would have some adverse impacts on a designated or undesignated asset and its setting which could only be partially mitigated.	The site would result in substantial harm to a heritage asset or its setting with no reasonable prospect of adequate mitigation.	Core Strategy Policy EN3 NPPF paras 189-202

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		significance and setting of those assets and their setting would be conserved or enhanced.			
	Agricultural Land / Soils Would development of the site be likely to result in the loss of agricultural land in particular the best and most versatile agricultural land?	No loss of agricultural land, development lies within an urban / settlement area.	Development would result in the loss of agricultural land grades 3b, 4 or 5	Development would result in the loss of best and most versatile agricultural land (grades 1, 2 or 3a)	NPPF Para 170
	Green Belt Would the site result in the loss of Green Belt and if so could the resultant change in green belt be achieved without significant harm to the local and strategic functioning of the Green Belt?	The site would involve no loss of Green Belt land.	The site would involve the loss of green belt land. However development and mitigation could be delivered in a way which would minimise green belt impacts and produce an appropriate new Green Belt boundary.	The site would involve the loss of Green Belt land. Even with mitigation there would be significant harm to the local and strategic functioning of the green belt.	NPPF paras 134, 136, 137 & 138 Core Strategy Policy SC7 Assessment to be based on the results of the green belt review.

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ENVIRONMENTAL PROTECTION					
	Air Quality Does the site lie within or in close proximity to a significant source of air pollution or within an area of poor air quality or a designated air quality management area?	The site lies within an area where air quality is not a current problem and any development can incorporate satisfactory measures to mitigate or offset its emissions and impacts in line with Core Strategy Policy EN8	Development lies within an area where air quality is not a current concern but where development could potentially exacerbate conditions with only limited potential for mitigate or offset those impacts. .	Either: The site lies within an area where air quality is not a current problem but development would have significant adverse impacts on air quality which could be only partially mitigated; or Site development would exacerbate air quality in an area of poor air quality with only limited or no reasonable prospect of adequate mitigation.	Core Strategy Policy EN8A NPPF paragraph 181 http://naei.beis.gov.uk/emissionsapp/
	Land Stability & Contamination Is the site subject to any land stability issues or contamination? Are there any potential adverse impacts arising from on-site structures, unstable	Either no issues identified or where there are issues but sufficient information and evidence in the	Issues have been identified which can only be partially mitigated by site remediation or minor	Substantial issues are identified with only limited or no reasonable prospect of mitigation such	Core Strategy Policy EN8B NPPF para 170e, & 178, 179

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	land, culverted watercourse etc.?	form of surveys is available and there is a reasonable expectation of satisfactory mitigation and remediation.	engineering works.	that development would pose a risk to human health, public safety and the environment in conflict with Core Strategy Policy EN8.	
	Former coal mining activity Is the site potentially affected by former coal mining activities?	The site is not in a defined Development High Risk Area and no issues relating to former mining activities have been identified .	The site lies within a Development High Risk Area or another area subject to former mining activity and there is a reasonable expectation that any issues can be satisfactorily mitigated such that there will be no risk to human health, public safety and the environment.	The site lies within a Development High Risk Area and it unlikely or uncertain as to whether any issues can be satisfactorily mitigated such that there will be no risk to human health, public safety and the environment.	Core Strategy Policy EN8B NPPF para 170e, & 178, 179 Coal Authority Interactive Map – showing development high risk area: http://mapapps2.bgs.ac.uk/coalauthority/home.html https://www.gov.uk/guidance/planning-applications-coal-mining-risk-assessments#check-if-your-site-is-in-a-high-risk-area-on-the-coalfield In its response the draft methodology the Coal Authority have stated that it, “would wish to see all those site allocations which fall within the defined Development High Risk Area, whether partially or wholly, identified in the Allocations Plan as being explicitly required to be supported by a Coal Mining Risk Assessment, together with clear information indicating that site layouts, densities and capacities may be affected by the presence of mining legacy features, particularly mine entries that should not be built over and

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					that prior extraction of remaining surface coal resources should be considered as an option to remediate mining legacy features . “
	Nuisance / Noise / Bad Neighbours What is the potential for adjacent land uses to constrain the type of uses that could potentially occupy the site? (i.e. in terms of noise and light pollution etc.)	No issues have been identified or where there are issues there is a reasonable expectation of satisfactory mitigation any.	Issues have been identified but could be which could only be partially mitigated.	Development of the site would cause significant issues in term either of amenity impacts for the users of the site (receptors) or would undermine the operation of the adjoining ‘bad neighbour’ use and there would be limited or no reasonable prospect of mitigation.	NNPF para 170e Core Strategy Policy EN8C
	Major Hazard Sites and Hazardous Installations Does all or part of the site lie within one of the defined zones around a major hazard site or hazardous installation?	The site does not lie within such a zone.	The site lies within such a zone and given the scale and nature of the proposed use the HSE does not advise against development;	The site lies within such a zone and given the scale and nature of the proposed use the HSE advises against it development.	NPPF para 45 NPPG https://www.gov.uk/guidance/hazardous-

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					substances#Handling-development-proposals-around-hazardous-installations HSE: http://www.hse.gov.uk/landuseplanning/ HSE methodology : http://www.hse.gov.uk/landuseplanning/methodology.pdf Core Strategy Policy EN8
	Waste Management Sites Could there be an impact on an operational waste management site or unimplemented allocation?	The site is not in close proximity to such a waste management site or allocation.	The site lies within close proximity to an operational waste management site or allocation but design and mitigation of the new site would mean that there would be no significant adverse impacts on the	The site lies within close proximity to an operational waste management site or allocation but design and could have a significant adverse impact on the operation of that waste management site.	

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			operation of that waste management site.		
	Mineral Sites Could there be an impact on an operational mineral extraction site or unimplemented allocation?	The site is not located within 500m of an operational mineral extraction site or allocation.	The site is located within 500m of an operational mineral extraction site or allocation but design and mitigation would mean that there would be no significant adverse impacts on the operation of the site.	The site is located within 500m of an operational mineral extraction site or allocation and could have a significant adverse impact on the operation of the mineral site.	
	Surface water flooding What is the likely risk and extent of surface water flooding on the site?	Either - no issues identified in relation to surface water flooding or - where surface water flooding is an issue, design and mitigation measures will completely or substantially reduce them and mean that the risk of flooding elsewhere is not increased.	Development would lie within areas at medium or high risk of surface water flooding and impacts can only be partially mitigated.	Development lies within a high risk area for surface water flooding and there is limited or no reasonable prospect of mitigation measures which would resolve on or off site impacts.	Core Strategy Policy EN7

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	Water quality / water source protection Is there any evidence of groundwater or aquifers on the site, or is the site within a drinking water source protection zone? Could development potentially affect any abstraction of groundwater intended for human consumption?	No issues identified. The site does not lie within a defined Source Protection Zone or would not adversely impact potable water sources.	The site lies within an area where there is potential for impacts on drinking water sources and there is potential for impacts which can only be partially mitigated.	The site lies within an area where there is potential for impacts on drinking water sources and with only limited or no reasonable prospect of mitigation.	NPPF para 170 Core Strategy Policy EN8D
ACCESSIBILITY TESTING & INFRASTRUCTURE					
	Accessibility Testing Does the site meet Core Strategy accessibility standards. Is it in a location accessible to local and higher order services and well connected to them via public transport?	The site and proposed use meets all the accessibility standards set out in Appendix 1.	There is a reasonable likelihood that service improvements could be secured such that the site would meet all the standards set out in Appendix 1.	The site does not meet the standards set out in Appendix 1	Accessible sites will contribute to several key goals ranging from reducing the need to travel and thus related carbon dioxide emissions, to creating healthy and sustainable communities. Sites will be tested against the public transport accessibility standards set out in Policy TR1 and Appendix 3 of the Core Strategy. These are reproduced in Appendix 1 of this paper. This provides an assessment as to whether the proposed site lies within given distances of bus or rail services and in some cases indicates walking distances. Account will be taken of the potential for development to support improvements to the current level of public transport services. Information will also be gathered relating to travel times. For each settlement travel times by public

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					transport to 8 different destination types (key services and facilities) will be recorded and heat maps produced (see approach taken in Kirklees's Local Plan, extract in Appendix 1). This will allow locations to be measured as having high, medium or low accessibility to each of the 8 destinations. The 8 destination types include – employment, primary schools, secondary schools, further educations, GP's, hospitals, and local / district centres and town or city centres.
	Site Access Is there a suitable point of vehicular access into the site? Would such an access require any improvements to achieve requirements such as visibility splays? Is the site subject to any ransom strips? Would the development have an significant impact on highway safety?	Yes There is an existing vehicular entrance with adequate visibility splays or one which is capable of being satisfactorily upgraded.	Securing a suitable access point is possible but difficult to achieve – for example because of the need to secure third party land etc.	No There is currently no vehicular access into the site. It is unlikely that a new access with adequate visibility splays can be provided. There is potential for significant impacts on highway safety.	NPPF paragraphs 108b, 109
	Local Road Network What is the capacity of the local road network to cope with the proposed development. Would any off site highways / junction improvements be required? Would the development have an significant impact on	There are no significant or unresolvable issues regarding local highway and junction capacity.	The development would cause adverse impacts on the local road network which could only be partially mitigated.	There is potential for significant impacts on highway safety which could not be mitigated.	NPPF Para 104b. 108, 109

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	highway safety?				
	Utility Capacity & Connections Are any infrastructure works required to provide adequate connections to essential utilities (water supply, sewage, drainage, electricity, gas, telecoms). Are there any significant existing infrastructure capacity constraints which will require addressing by providers?	Either all relevant connections are available within the site and there are no known capacity issues or any issues are readily resolvable – for example there are planned and funded capacity improvements programmed and any missing connections can readily be made.	Development of the site would require significant improvements to infrastructure provision and while solutions are possible there remains doubt over the form, timing or funding of those mitigations.	There are major constraints regarding connections and capacity which are unlikely to be resolved.	NPPF para 16c, 25, 104b
	Local Services (Education / Health) *I am assuming we won't include this but if we do a sentence as follows – 'are there any significant existing deficiencies in the capacity of local schools and health services which need addressing?*	There are no significant current problems regarding local service provision and / or no expected issues relating to the proposed development which cannot be adequately	The development lies within an area where there are significant current issues with regards to the provision or capacity of local services and / or there is uncertainty as to how current issues can be	The development would cause significant issues with regards to the provision and capacity of local services with no likely solution which would satisfactorily mitigate those	Local Infrastructure Plan

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		addressed for example via CIL or S106 contributions at application stage;	overcome.	issues.	
DELIVERABILITY					
	Topography Is the topography of the site a significant development constraint which could undermine the site's deliverability for example by requiring engineering solutions that will constrain the size and shape of the plots or reduce a sites viability.	There are no issues relating to topography or there issues but with achievable design solutions which would not undermine site deliverability.	The site exhibits topographical issues which would have a significant impact on a sites design and / or could substantially reduce developable area and thus yield.	Site topography is severe and challenging and would be likely to render the site undevelopable.	
	Utilities - Gas Pipelines / Electricity Cables Is any part of the site within the buffer zone of high pressure gas pipeline (150M) or affected by overhead or underground electricity cables?	Either none or only a small part of a site is affected allowing for mitigation via site layout or site boundary adjustments.	A significant part of the site lies is affected but mitigation is possible.	The presence of high pressure gas pipelines and / or overhead cables constrains the site to an extent that makes it unlikely to be developable.	
	Viability & Market Demand Is the site in an area of strong or	The site lies within a broad area without any viability	Either: The site lies within a	The site lies within an area which the Council's Viability	NPPF para 67,

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	weak market demand and viability?	concerns (as indicated in the Council's Viability Study) and / or where market demand is strong	broad area where the Council's viability study has indicated that viability is marginal; or The site lies within a broad area where the Council's viability study has indicated that development would not currently be viable but where there is reasonable prospect of uplift e.g. there are regeneration initiatives, public sector investment or infrastructure improvements planned.	study has indicated that development is not viable and there is no reasonable prospect of this changing for example as a result of improving market conditions or Council / public sector interventions.	NPPG : https://www.gov.uk/guidance/viability#viability-and-plan-making
	Mineral Reserves / Safeguarding Does the site lie within 500m of an existing active minerals extraction site or within a minerals safeguarding area or an area of search for minerals? Would development be likely to lead to the sterilisation of an	No – the site lies outside of such areas.	Site lies within or partially within a MSA or partially within 500M of an active mineral extraction site.	The site lies within 500M of an active mineral extraction site or within a MSA where the requirements of Core Strategy Policy EN12 are unlikely to	NPPF paragraphs 203-206 Core Strategy Policy EN12

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	economically significant mineral resource?			be met.	
	Abnormal Site Costs Would development of the site require addressing any abnormal site conditions and costs for example remediating land stability, contaminated land, derelict land buildings etc	No or any such issues are minor and capable of being addressed without impacting on the developability of a site.	Yes and the abnormal conditions are significant given their scale or the presence of a site within an area with marginal viability.	Yes and those conditions and cost are of a nature which are likely to make the site undevelopable.	