Core Strategy Partial Review – Preferred Options

Environment Workshop – Friday 6th September 2019 – 2-4pm

Banqueting Hall, City Hall, Bradford

Workshop Notes

Climate Change

Questions:

- Does the plan do enough to tackle climate change?
- Should the policy include any specific targets and if so, in what form should they be?

Table 1:
2,700 houses and road proposal in the Holme Valley (Holmewood Urban Extension) plus airport expansion – doesn't fit with Climate Change – at odds with paragraph 3.84 of the introductory text to the policy.   - More fluidity within the policy is needed to enable it to respond to changing evidence.   - Resilience for the future needs to be built in to the policy – reference to food, trees, meadows etc – needs to be made stronger across the policy – needs to be more explicit (Policy point A7).   - Avoid vague terms e.g. 'high standards' – replace with targets.   - Policy point A8 – with the focus on electric vehicles / charging – how is the electricity generated? Is it renewable?   - Smaller, more fluid transport options needed.   - How is the engagement described in point B3 to be made effective?   - Policy point D: New development – where is the land for this? Land is a finite resource.   - Any targets to be included need to be well thought out, practical and sufficiently challenging.   - Councils have an obligation to act therefore the policy needs to include fluid targets.   - Use sustainable materials in new build and incorporate SuDS etc   - Holland has some good examples.

Table 2:
- The policy is vague – encourage walking/cycling etc. rather than integrating in the highways development.   'Prevention is better than the cure' – mitigating factors such as solar panels, ground source heat pumps should be required. Need to be proactive rather than passive.   - House building – default materials are brick and concrete rather than wood etc – need to think about using more sustainable materials.   - Include better use of fuel (i.e. gas).   - More footpaths needed on housing developments and promotion to encourage usage.   - Live bus info at bus stops would help to encourage bus use.   - Very much developer led at present rather than LA – local people then need to produce info / data to alter plan.   - If houses are to be built along rail corridors there needs to be more train services otherwise it will just lead to more car usage.   - Restrictions perhaps needed on highways e.g. number, speed, size etc. to help reduce emissions.   - Good that brownfield is being prioritised over greenfield – results in fewer car journeys etc.   - Aim for ZERO carbon rather than 'low carbon' – as 'low' has no measurement.

• Do NOT build new developments that don't have all the new net zero technologies integrated.
• Subsidising public transport and increase the number of bus routes.
• New buildings to be made efficient enough so as not to require fossil fuel use.

Table 3:
• The policy does not do enough to tackle climate change – probably meeting natural targets.
• There is a risk that any under achievement wouldn't be made up.
• The housing stock is inadequate –may meet current designated levels but not target 2030 – carbon neutral – West Yorkshire 2038 target.
• Putting policy in place to effect developments
• Lots we can do but not enough to force
• Lack of investment , funding issues and lack of capital
• Tighten control – look at other targets for 2038.
• Questioned where the 2030 target has come from?
• CBMDC has a huge property portfolio compared with WYCA making meeting the target difficult.
• Need to include targets for building materials.
• Should be building to Building Regulations.
• Need to consider transport emissions.
• How is CIL being looked at?
• There is a lack of electric vehicle charging points.
• What policy is in place for developers to address flooding issues?

Green Infrastructure

Questions:

- What feedback do you have on the approach taken to Green Infrastructure in the Plan?
- What ideas do you have for introducing GI into new developments? Have you got any good practice examples you can share?

Table 1:
- The Holme Wood Urban Extension is at odds with the plan in terms of the Green Infrastructure policy.   - How do you encourage local people to use GI – this needs to be explicit in the plan.   'Natural Assets' – the policy needs to go further to give these greater protection and this should be prioritised.   - Schools and curriculum links – need more engagement.   - The policy supports the identification of green infrastructure – but how is it to be better protected?   - Mown grass – wildlife friendly maintenance regimes are needed and should be a requirement.   - Any form of wilding/re-wilding needs management.   - Transition towns – e.g. Totnes – good examples of moving to low carbon including use of GI.   - Use examples from Scandinavia – other countries are further ahead in GI thinking.   - Needs more fundamental change from financial institutions.

Table 2:
- Should we include the Leeds/Liverpool – Bradford Canal in the GI plan? i.e. tow path for walking/cycling/commuting.   - Can we include 'greenways' and their creation / inclusion to get default support? – this would lift the priority enabling greater funding opportunities.   - The Otley to Burley Greenway has been held up due to issues with planning in Bradford. Can the policy help to prioritise and give certainty to the Greenway development?   - Prioritise greenways and other GI upfront in planning infrastructure.   - Wakefield to Low Moor greenway – former transport museum – connects communities and schools which helps to take cars off the roads. Helps support sustainable travel in West Bradford.   - Other examples further afield e.g. Bath to Bristol.   - Able to link the plan to national advisory groups e.g. Sustrans   - Strengthen governance and inclusion of community and other groups e.g. Bradford Becks group.   - Utilise more native species of plant/trees – which help to join and connect habitats.   - Include food plants for local foraging (e.g. University of Bradford).   - Treat GI as a priority in planning applications / Local Plan.   - Permeable surfaces for parking should be a requirement.

Table 3:
- Important that new developments provide GI and POS as part of proposals.   - Working with partners / community and groups e.g. Forest of Bradford   - Lack of investment funding.   - Tighten regulations on developers.   - Require the use of hedges instead of fencing but consider maintenance.   - Making use of redundant land and brownfield sites.   - Wildflower planting of verges and existing sites.   - Creation of POS in cemeteries.   - Policy wording should be stronger – enforce those policy points which use 'should'.

Biodiversity Net Gain

Questions:

- What do you think are the key barriers to effectively implementing biodiversity net-gain?
- Are there any parts of the policy which require further development or clarification?

Table 1:
• We can't save what's already been lost.
• Timing of the policy means we will lose a lot
• Decision makers need clear guidance on the policy and how it works.
• Process is weighted in favour of developers.
• Viability argument - one way to overcome this is for councils to build their own homes.
• Cynical developers – e.g. netting of hedges to stop birds nesting then removing hedges.
• Assets need to be defined and better protected. How are assets identified in the first instance and how are they valued?
• How is biodiversity to be measured in the first place – need a better understanding.

Table 2:
• Recording – need to have a baseline i.e. recording, monitoring needs to be more robust.
• Net gain – species numbers or population numbers or habitat area?
• There should be specific targets for species, habitats in the document.
• If developer led then there are potential weaknesses, should it be LA led instead?
• Wording – e.g. "enhance current local biodiversity " may be too broad.
• Barrier – document doesn't go far enough e.g. stating particular species /habitats that are already doing well in population/diversity.
• Make it site specific.
• Current degradation of habitats/species may result in lack of growth in number/quantity.
• Barrier – resources in LA e.g. ecologists, enforcement staff, planning conditions.
• Physical checks required to sign off on the development after completion e.g. bat boxes installed, trees planted etc.
• Barrier – a document needs to be robust and defensible – able to enforce positively.
• Environment Bill needs to get through Parliament with minimum of 10% net gain stated.
• Have Natural England checked the document before approval?
• Potential review of Policy SC8 is needed?

Table 3:
• Barriers - developers want to develop to maximise profit and will look to rush applications through the system without carefully considering biodiversity or try to limit what they provide.
• Developers choosing Greenfield sites as they may be easier to develop but what does it mean for biodiversity?
• What are the long term plans?
• Are commuted sums / CIL to be paid for future maintenance?
• Barriers - what tools do we use to evaluate the net-gain proposals?
• Developers paying external consultants to make proposals better than they may be.
• Good that this is backed up by the NPPF.
• What protection is in place to make sure these plans are implemented – sites can take 10-15 years to develop?