

Bradford City Centre Area Action Plan (AAP) &  
Shipley and Canal Road Corridor Area Action Plan (AAP)

Sustainability Appraisal Adoption Statement

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## Adoption Statement

This Sustainability/Environmental Statement for the Sustainability Appraisal (incorporating strategic environmental assessment) of the Bradford City Centre Area Action Plan (AAP) & Shipley and Canal Road Corridor AAP has been prepared in accordance with the following requirements:

- Regulation 36 of the Town & Country Planning (Local Development) (England) Regulations 2004
- Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
- Paragraph 165 of the National Planning Policy Framework 2012

It explains how sustainability considerations have been incorporated into the AAPs; how the SA has been taken into account; how the results of consultation have been taken into account; the reasons for choosing the adopted AAPs, in the light of other alternatives considered; and how the significant sustainability effects of implementing the AAPs will be monitored.

## Introduction

The City of Bradford Metropolitan District Council formally adopted the City Centre AAP & Shipley and Canal Road Corridor AAP at a meeting of the Full Council on 12<sup>th</sup> December 2017. The AAPs cover the priority regeneration and growth areas of Bradford City Centre, Shipley and Canal Road Corridor within the Bradford District.

The AAPs form the key statutory planning framework for Bradford City Centre, Shipley and Canal Road Corridor and plan for sustainable growth in these areas to 2030. The AAPs include policies and allocations for housing, employment, transport improvements, recreation and open space in line with the National Planning Policy Framework and relevant planning regulations. The AAP allocates sufficient sites required to deliver the Core Strategy housing target for the area (3500 in the City Centre and 3100 in Shipley and Canal Road Corridor).

A considerable amount of public consultation has been undertaken during the production of the AAPs. Key production and consultation stages include the following:

- Bradford City Centre AAP: Issues and Options in 2007 / 2008
- Bradford City Centre AAP: Further Issues and Options in March 2013
- Shipley and Canal Road Corridor AAP: Issues and Options in March 2013
- Bradford City Centre AAP: Publication Draft in December 2015
- Shipley and Canal Road Corridor AAP: Publication Draft in December 2015
- Examination of Bradford City Centre AAP & Shipley and Canal Road Corridor AAP – including hearings held in March 2016 and October 2017
- Consultation on Main Modifications to the Publication Draft – July / August 2017
- Adoption – October 2017

The Planning Inspector's final report in September 2017 concluded that the AAPs are sound, subject to modifications.

## How environmental & sustainability considerations have been integrated into the AAPs

Throughout the plan-making process, the SA (incorporating SEA) has been carried out as an iterative and on-going process to inform decision making for the developing the Plans. The SA was undertaken in accordance with government guidance<sup>1 2</sup> for a staged approach that integrates appraisal to consider the effects of the emerging AAPs on socio-economic as well as environmental factors. Independent specialist consultants Amec Foster Wheeler were appointed to carry out the SA. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into the developing stages of the Plans.

The SA production consisted of 5 key stages:

1. Stage A: Scoping - Setting the context and objectives, establishing the baseline and deciding on the scope
2. Stage B: Options Assessment - Developing and refining options and assessing effects
3. Stage C: Preparing the SA Report
4. Stage D: Consultation on the preferred options and SA Report
5. Stage E: Monitoring the significant effects

These key stages have been carried out during the following stages of production of the AAPs:

1. Stage A: Scoping (City Centre AAP September 2007 / January 2013)
2. Stage B: Options Assessment (October 2013)
3. Stage C and Stage D (Publication Draft) (October 2015)
4. Stage C and Stage D (Submission Draft) (April 2016)
5. SA Addendum (Modifications) (June 2017)
6. Stage E: Monitoring

### Stage A: Scoping

A Scoping Report was first published in August 2007 (City Centre AAP) and September 2012 (Shipleigh and Canal Road Corridor AAP) and a full consultation exercise was undertaken at this time. The Scoping Reports included an SA Framework based on the Framework developed for the SA of the LDF Core Strategy DPD which has been revised so that the objectives and appraisal questions within it are relevant to the appraisal of the AAPs. The second Scoping Reports were prepared in September 2007 (City Centre) and January 2013 (Shipleigh and Canal Road Corridor AAP) following the consultation on the original version which took into account the responses from consultees, as part of the wider consultation on the Issues and Options. The SA Frameworks were changed in response to consultation comments and the second Scoping Reports were also subject to another round of consultation. The revised SA

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<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>2</sup> <http://www.pas.gov.uk/pas/core/page.do?pagelid=109798> March 2013

frameworks that were published within the second Scoping Report has been at each stage of SA / Plan production.

### **Stage B: Options Assessment**

The purpose of the SA is to appraise the social, environmental and economic effects of strategies and policies from the outset of the plan preparation process. The SA is a tool used in ensuring that decisions are made that meet the requirements of sustainable development. The integration of sustainability into the plan starts formally at the stage of issues and options. In keeping with SA guidance, the effects of the strategic options were assessed in broad terms with the aim of assisting in the selection of the preferred approach. The alternative options for the Plans were set out in AAP Issues and Options Reports, which were published in March 2013. This document included both site and policy options and both of these elements were subject to SA.

### **Stage C and Stage D (the Publication Draft)**

In December 2015, the Council published the City Centre AAP & Shipley and Canal Road Corridor AAP Publication Drafts for public consultation, for a period of 8 weeks. This was accompanied by a Sustainability Appraisal report. The purpose of this SA report was to ensure that the sustainability implications of changes to the plan had been assessed and taken into account. Each policy change was analysed and the appraisal matrices were updated, and contained the updated appraisal matrices. The appraisal matrices showed the assessment that was carried out at the previous plan stage (Issues and Options) and the implications to the SA of any changes that have been made to each policy. Mitigation and enhancement measures were also included in the matrices.

### **Stage C and Stage D (the Submission Draft)**

No formal representations were made on the City Centre AAP Publication Draft SA and only two received on the Shipley and Canal Road Corridor AAP, which resulted in no changes between the Publication Draft and the Submission Draft. The appraisal matrices show the assessment that was carried out at the previous plan stage, and again at the Submission Draft stage. Mitigation and enhancement measures that are still outstanding are also included in the matrices.

### **SA Addendum (Modifications)**

In June 2017 Bradford Metropolitan District Council (BMDC) identified a number of proposed modifications to policies in the submitted AAPs. These proposed modifications related proposed amendments to planning policies and site allocation statements to address concerns raised by Inspector and proposed amendments to incorporate the 'Outstanding Mitigation' put forward by the Sustainability Appraisal (April 2016).

### **Stage E: Monitoring**

The SEA Regulations (Regulation 17) require the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects, and to be able to take appropriate remedial action.

The monitoring undertaken on the AAPs will help to:

- Monitor the significant effects of the plan;
- Track whether the plan has had any unforeseen effects; and
- Ensure that action can be taken to reduce / offset the significant effects of the plan.

The requirements of the SEA Regulations focus on monitoring the effects of the plan. This equates to both the plan's significant effects and also unforeseen effects.

Monitoring will allow the Council to identify whether the recommended mitigation measures from the SA have been effective and develop further mitigation proposals that may be required where unforeseen adverse effects are identified. In some cases monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the AAPs, or for further policy guidance to be developed (for example an SPD).

## **How the Sustainability/Environmental Report has been taken into account**

**SA Scoping and Options Assessment:** The SA Scoping Report established the baseline, the key sustainability issues, the policy framework for the SA and set the context for the SA - all of which informed the early draft of issues and possible options to resolve the issues through the AAPs.

**Options Assessment and Preparation of the SA Report with consultation:** The subsequent stages of the SA were undertaken at the same time as the equivalent stages of the plan-making process so that the findings and recommendations of the SA could be integrated at each stage. The choices regarding spatial strategic locations and themes for strategic policies were subject to SA using the framework of SA objectives. Mitigation for negative effects identified was suggested through changes to policy wording to strengthen sustainable development. SA Reports were published at the same time as the Publication Draft and Submission Draft, and it recorded the findings of the SA Reports and the way in which they had influenced the choices available to the plan-making.

**SA Addendum of Modifications:** A number of the modifications were made in order to incorporate the outstanding mitigation measures proposed within the SA reports; therefore, these improved the performance of the Plans against the SA objectives.

## **How the results of consultation have been taken into account**

At each stage of the consultations from SA scoping through to Submission and Modifications of the AAPs and their accompanying SA Reports and Addendums, the SA Reports set out the responses received and the way in which the SA took them into account in a separate appendix. This included the initial formal scoping consultation with the environmental bodies – Environment Agency, Natural England and Historic England.

## **Reasons for choosing the AAPs as adopted**

The SA examined and appraised the vision and objectives; it appraised the site allocations and the policies to guide the development across the City Centre, Shipley and Canal Road Corridor. The potential positive sustainability effects of the proposed development, and the mitigation of potential negative effects, are dependent upon the implementation of the AAPs policies as adopted. The plan making and the SA processes established that the adopted AAPs were the most sustainable approach for implementing the development need that had been locally-derived for the Plan period.

## **Measures that are to be taken to monitor the significant sustainability/environmental effects of the implementation of the AAPs**

The AAPs will be subject to an on-going programme of monitoring as part of the Councils' Annual Monitoring Reports (AMR). This includes a broad range of indicators and targets set out in appendices to the AAPs that incorporates the needs of the Plans and the SA Reports. This will demonstrate the effectiveness of the policies and allocation in the AAPs and enable any unforeseen effects arising from its implementation to be identified. Monitoring will also provide information as to whether the predicted effects of the SA were accurate; and this information will be considered in the next round of plan-making and the accompanying SA. Monitoring Reports for the AAPs will be available for review on the Councils' websites.