

**Bradford Local Plan**

**Core Strategy Examination Session Day Ten**

**Matter 7A: Strategic Core Policies (Other)**

**Date: 19<sup>th</sup> March 2015**

**Venue: Victoria Hall, Saltaire**

## Issue 7.1

### Policy SC2 – Climate Change and Resource Use

- a. **Is the approach to Climate Change and Resource Use, including the specific requirements set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- b. **Is the policy unduly onerous and inflexible, and does it take into account viability considerations and the recent national consultation about how the Government intends to deal with many of the code standards through the Building Regulations?**

### Response

- 1.1 Addressing climate change is a key government priority for the planning system. Policy and guidance indicate that new development should be planned to avoid significant vulnerability to impacts arising from changes in the climate. Where development needs to be brought forward in areas that are vulnerable, risks need to be managed through suitable adaptation measures so as to provide sufficient resilience. Addressing climate change is a strategic core policy as it is a priority both for the Council and national government. Thematic sections relating to energy, flood risk, biodiversity, green infrastructure, transport and environmental protection provide more detail on addressing impacts.
- 1.2 Seeking to locate the majority of new development in existing urban areas will reduce the need for additional supporting infrastructure and resource use. The Core Strategy seeks to identify locations for development that are resilient to higher fuel, energy and travel costs and support a longer term shift in living patterns towards more locally based activity.
- 1.3 The Yorkshire and Humber Climate Change Adaptation Study (2009) provides information at a regional and district level on projected climate change and the potential impacts of change. The projected changes that the district is likely to face by the 2050s include; higher winter average temperatures, hotter and drier summers, winter average rainfall increasing by 15% and slightly higher winter wind speeds.
- 1.4 The aims identified in SC2 are broadly linked to the findings of this study, issues of particular importance due to conditions within the District and to strategies currently being progressed by the Council.
- 1.5 Guidance from government and the Environment Agency advocates a partnership approach to flood risk. Bradford Council has a history of working pro-actively to address local flood risk issues, bringing in expertise from local universities and organisations from other areas in Europe to work with communities on a range of projects. The provisions of the Floods and Water Management Act give local authorities a stronger leadership role in the future.

- 1.6 Periods of high temperatures could also increase the likelihood of air pollution events. A Low Emission Strategy which aims to take a proactive approach to help maintain and improve air quality within the District was adopted in 2013.
- 1.7 The vulnerability of the housing stock to the impacts of climate change will be dependent on its location, age, state of repair and efficiency of insulation and heating systems. Fuel poverty, caused by increasing costs of energy, low household income and properties with poor energy efficiency, is also a significant issue for Bradford district. The best means of reducing fuel poverty is by increasing the energy efficiency of the homes of vulnerable people and to address this issue district has an Affordable Warmth Strategy. The Council is also working with partners in the Leeds City Region to maximise the opportunities to deliver carbon saving in the housing sector.
- 1.8 The policy identifies sustainability principles, rather than stating specific requirements, it is therefore not considered to be unduly onerous or inflexible. It would allow viability to be taken into account at later stages in the plan-making process or through site by site assessment.
- 1.9 SC2 identifies principles which contribute towards the achievement of sustainable design and resource use. These are considered to be sufficiently flexible to be able to accommodate any changes introduced through the Housing Standards Review.

## **Issue 7.2**

### **Policy SC3 – Working Together**

- c. **Is the approach to Working Together, including the specific supportive measures set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

### **Response**

- 2.1 Policy SC3 recognises that a range of bodies as well as communities are key to delivery of the local plan. In particular the core planning principles in NPPF and paragraphs 153 – 157. The Policy sets out key strategic issues which are not exhaustive but provide the priority areas where joint/ collaborative working may be required to ensure sound local plan documents and support their delivery.
- 2.2 It also explicitly recognises the ‘Duty to Cooperate’ and its key role in ensuring Local Plan documents meet the legal requirement and also are effective in discharging the new duties in line with NPPF (paragraphs 178 – 181) and advice in NPPG.

- 2.3 The policy is effective and deliverable. The Duty to Cooperate Statement (SD006) sets out the existing arrangements for discharging the duty to cooperate in preparation of local plan documents.

### **Issue 7.3**

#### **Policy SC6 – Green Infrastructure**

- d. **Is the approach to Green Infrastructure, including specific sub-regional drivers, specific locations and definition of Green Infrastructure set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

### **Response**

- 3.1 Work on developing the concept of Green Infrastructure (GI) has been carried out by Natural England, the Environment Agency and by regional and sub-regional planning bodies. A key aim is to raise the status of GI to that of more traditional forms of infrastructure.
- 3.2 Defining GI forms an element in a place-shaping agenda that seeks to recognise the character and distinctiveness of different locations. The quality and diversity of the District's landscape character, its heritage value and cultural associations and the legacy of historic buildings, conservation areas and parks are important strengths. Work carried out to date on the Saltaire World Heritage Site, on Conservation Area Appraisals and on Landscape Character Assessment represents an important starting point in identifying design principles.
- 3.3 As a strategic core policy GI provides a common thread that links other important issues in the Core Strategy; local resilience to climate change (in relation to the provision of flood water storage, sustainable drainage and urban cooling), sustainable transport and housing, tourism, health and well-being and making space for water. Particular aspects of GI have been developed in the environment theme policies relating to biodiversity, recreation and open space, heritage, design and landscape. Data relating to ecological network mapping, local sites, open space and flood risk will be of particular importance.
- 3.4 Leeds City Region commissioned the GI Strategy to ensure that future growth is underpinned by high quality GI and to address climate change. This has influenced the sub-regional drivers. The Leeds City Region Strategy was influenced by the earlier Natural England work and recognises the importance of Rombalds Moor and the corridors of the Rivers Aire and Wharfe for residents across the City Region. It proposes a range of initiatives to maximise the impact of GI and has links with city region housing and regeneration programmes.

- 3.5 The NPPF and guidance supports an approach which recognizes the multiple benefits that open land can provide, particularly in relation to habitats for wildlife and opportunities for recreation, water management and food production. It emphasizes the need to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure and encourages the protection and enhancement of valued landscapes. Natural England supports the view that GI should take account of the ‘landscape context, hinterland and setting, as well as strategic links of sub-regional scale and beyond’.
- 3.6 Further work to define Green Infrastructure will be carried out through the preparation of the other Local Plan documents. Locations for development will be identified that offer opportunities to enhance Green Infrastructure and principles of design will be set out to deliver this.
- 3.7 The identification of urban extensions, local green belt releases and proposals to develop Greenfield sites can represent opportunities to deliver GI. The Rights of Way Improvement Plan aims to assess the extent to which the network meets present and likely future needs and includes actions to secure an improved network. Routes of regional significance and improvements to the network that offer amenity benefits will influence future green infrastructure provision.
- 3.8 Proposals and programmes should seek to contribute towards identifying GI at a neighbourhood scale to improve the quality of life and sense of place within the urban areas. The key areas of change set out in the policy offer opportunities to improve Green Infrastructure focusing on particular objectives. These are based on current projects, proposals that will be progressed through local plans, regional routes and those offering sustainable transport and high levels of amenity, strategic projects being progressed with environmental agencies and areas of deficiency linked to densely developed, deprived urban areas and health needs. The evidence base is considered to be proportionate to the level of detail in a strategic policy.

#### **Issue 7.4**

##### **Policy SC9 – Making Great Places**

- e. **Is the approach to Making Great Places, including the specific measures set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance?-**

#### **Response**

- 4.1 Good design is key in terms of realising the Spatial Vision and Strategic Objectives of the plan. As stated in the NPPF and PPG, good design is indivisible from good planning and should be at the heart of

the plan-making process. Strategic Policy SC9 sets out what is expected in terms of the overall quality of place in the district and sits above the more detailed design policies DS1 – DS5. The policy seeks to create attractive, locally distinctive neighbourhoods, streets, buildings and spaces which are safe and accessible to all, and that will stand the test of time.

- 4.2 The Council considers that the Policy is soundly based. The case for this is set out below and is based on the criteria set out in paragraph 182 of the National Planning Policy Framework.
- 4.3 The policy has been positively prepared. It seeks to help achieve several of the Strategic Objectives set out in Paragraph 3.15 of the Core Strategy, in particular objectives 10, 11, 12 and 14. These aspire to create socially inclusive places that are safe, sustainable, attractive and accessible, and which reinforce local distinctiveness and foster a shared sense of civic pride. The policy supports these aspirations.
- 4.4 It is considered that the policy sets out an appropriate strategy based on proportionate evidence. The Core Strategy Baseline Analysis Study (EB/038) identifies a number of background documents which provide a good understanding of the character, quality and opportunities of places in the district. These have informed the preparation of the policy.
- 4.5 An understanding of the existing character of the district is provided by the Landscape Character Assessment SPD, the Conservation Area Assessments and Appraisals and The Settlement Study Update. These identify the elements which contribute to local character along with guidance on how future development can maintain, enhance and respond to it. Chapter 6 of the Baseline Study provides further detail on these documents.
- 4.6 The Council has identified a number of areas in the district for regeneration and change. Assessments have been undertaken of the existing quality of these areas and of the opportunities that exist to enhance them and make them better places. Chapter 3 of the Baseline Study lists and provides further details of these. They include the work undertaken for Bradford City Centre (including the City Centre Design Guide SPD), the Canal Road Corridor, Manningham, Airedale, and East Bradford/Leeds Bradford Corridor.
- 4.7 A Viability Assessment (EB/046) has been undertaken by DTZ of the policies in the Core Strategy Publication Draft. It finds (Table 3.2, page 17) that Strategic Policy SC9 will have no direct impact on the economic viability of development. Therefore it is considered that the policy is effective and deliverable. Also it is considered that the wording of the policy allows for flexibility. It will enable proposals to evolve and to achieve the most appropriate balance between the design vision and deliverability.

- 4.8 As well as NPPF, the policy has been informed by the following guidance:
- Manual for Streets (DfT, 2007) – This document is retained following the review of national planning guidance by Lord Taylor of Goss Moor.
  - Building for Life 12 (Design Council Cobe/Design for Homes/Home Builders Federation, 2012) – Whilst this is not formal national planning guidance it is endorsed by the government as the national standard for well designed homes and neighbourhoods.
- 4.9 Below is a summary of how each of the criteria of the policy are consistent with national policy and guidance.
- 4.10 Criterion 1 is about understanding the wider context and taking the opportunities to improve places. It is consistent with:
- NPPF paragraphs 58, 61 and 64;
  - PPG paragraph 014 (Design section);
  - Manual for Streets paragraphs 3.6.1 – 3.6.7; and
  - Building for Life questions 1, 2 and 3.
- 4.11 These identify the importance of considering what is already successful about places and thinking about how they could be improved. This might include movement networks, local facilities, public spaces or the general appearance and environmental quality of an area.
- 4.12 Criterion 2 is about being place specific and responding to local character. It is consistent with:
- NPPF paragraphs 58, 60, and 61;
  - PPG paragraphs 007 and 020 (Design section);
  - Manual for Streets paragraphs 3.6.1 – 3.6.3 and 5.11; and
  - Building for Life questions 5 and 6.
- 4.13 These highlight the potential of development to reinforce local distinctiveness. This could be achieved by responding to local patterns of streets and building forms, natural features and topography, materials and style, as well as reflecting an area's function, history and culture.
- 4.14 Criterion 3 is about creating a strong sense of place through the design and arrangement of buildings, streets and spaces. It is consistent with:
- NPPF paragraph 58;
  - PPG paragraphs 021, 023 – 027 and 042 (Design section);
  - Manual for Streets paragraphs 3.6.20 – 3.6.21, 4.5, and 5.6 – 5.9; and

- Building for Life questions 7 and 8.
- 4.15 These outline how the design of buildings, streets and public spaces should be considered holistically so that they relate well to each other and contribute to the overall quality of the place, creating attractive environments for people.
- 4.16 Criterion 4 is about creating a network of connected routes and spaces which are safe and accessible to all. It is consistent with:
- NPPF paragraphs 58 and 69;
  - PPG paragraphs 008, 009, 012, 018, 022 and 024 (Design section);
  - Manual for Streets paragraph 4.2; and
  - Building for Life questions 8, 9 and 11.
- 4.17 These identify the importance of creating places with a connected network of routes and spaces which link into surrounding areas and are easy for people to understand and find their way around. It includes designing routes are safe, accessible and inclusive by considering the needs of all users including disabled people, older people and children.
- 4.18 Criterion 5 is about designing places which can adapt to change and will function well over the longer term. It is consistent with:
- NPPF paragraph 58;
  - PPG paragraphs 016 and 019;
  - Manual for Streets paragraph 4.1.
- 4.19 These highlight the importance of designing places which are fit for purpose, resilient and flexible. This includes achieving value for money in terms of lifetime costs, designing buildings which can be adapted to changing needs and uses over time, and ensuring elements such as the streets are well planned because once laid down they cannot easily be changed.