

LOCAL DEVELOPMENT FRAMEWORK FOR BRADFORD

**APPENDIX 2: HOUSEHOLDER
SUPPLEMENTARY PLANNING DOCUMENT**

**SUSTAINABILITY APPRAISAL REPORT
DRAFT FOR PUBLIC CONSULTATION**

December 2011

The wording in this publication can be made available in other formats such as large print or Braille. Please call 01274 434296

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1.0 NON-TECHNICAL SUMMARY

Why produce a Householder Supplementary Planning Document?

1.1 The Householder Supplementary Planning Document will replace both the existing House Extensions Policy and Dormer Windows Policy which are now due for review. The purpose of Supplementary Planning Document is to provide clear and practical design guidance to supplement local and national planning policy with the following key aims:

1. Give homeowners and designers a clear basis for developing proposals, with some certainty that the final result is likely to be acceptable to the Council
2. Ensure that proposals are well designed and complement or enhance the character of the original property and the wider area
3. Protect the residential amenity of neighbours
4. Safeguard the natural environment, including trees and protected species
5. Prevent the creation of dangerous highway conditions

What is a Sustainability Appraisal and why do we do them?

1.2 Sustainability Appraisal is a process which the Council uses to identify the likely effects of implementing a planning document upon the sustainability objectives set out by the Councils Sustainability Appraisal Framework. It is used to help the Council minimise any negative impacts and maximise any positive impacts upon sustainability.

1.3 When the Council started the process in May 2008 this Sustainability Appraisal was also a requirement of planning law, however, this requirement has since been removed by the Planning Act 2008. Nevertheless, the Council have chosen to complete the process to help inform a better document and ensure compliance with European law.

What are the stages of Sustainability Appraisal?

Table 1: Stages of the Sustainability Appraisal

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope;
Stage B	Developing and refining options and assessing effects;
Stage C	Preparing the Sustainability Appraisal Report;
Stage D	Consulting on draft SPD and Sustainability Appraisal Report;
Stage E	Monitoring the significant effects of implementing the SPD.

- 1.4 The key stages of Sustainability Appraisal are set out above. Stage A has already been completed, this document represents stages B, C and D. These stages are explained in more detail in Section 3.

What are the conclusions of this Sustainability Appraisal?

- 1.5 This report concludes that the Householder SPD will help to promote sustainability. In particular, it will have a positive impact upon sustainability objectives such as making urban areas more attractive through good design, enhancing townscape value, and facilitating the provision of a range of good quality housing. No significant negative impacts are foreseen, however it is acknowledged that there are some uncertainties over the potential impact upon the ability of some households to meet their housing needs. These concerns are outlined in paragraphs 7.18 – 7.19.
- 1.6 The Council now welcomes comments on this Draft Sustainability Appraisal Report, the Draft Householder Supplementary Planning Document and the Draft Equalities Impact Assessment.

HOW TO COMMENT

Bradford Council welcomes your comments on this draft Sustainability Appraisal Report.

Comments can be sent to the following address:

Bradford Local Development Framework
8th Floor Jacobs Well
Manchester Road
Bradford
BD1 5RW

Comments can also be:

- Emailed to ldf.consultation@bradford.gov.uk
- Faxed to 01274 433767
- Handed in to the Planning Offices at Jacobs Well, Bradford or the Town Halls in Ilkley, Keighley and Shipley.

Please head the letter, email or fax **Sustainability Appraisal Report - Householder Supplementary Planning Document** and clearly set out your comments.

Please ensure that your comments arrive no later than 30th February 2012.

The document will be made available in different formats on request.

If you have any queries regarding this document, or the Local Development Framework please do not hesitate to contact the Local Development Framework Group on (01274) 434296.



Planning Aid England (PAE) provides a free, independent and professional planning advice service to individuals and groups who cannot afford professional fees. The organisation may be able to assist groups and individuals who would like support and advice in order to get involved in this consultation process. Contact the PAE Community Outreach Coordinator for further information: Tel:- 0781 268 2797 or E-mail mike.dando@planningaid.rtpi.org.uk

Website: <http://www.rtpi.org.uk/planningaid> <http://www.planningaid.co.uk/>

2.0 INTRODUCTION

Purpose and Aims of the Supplementary Planning Document

2.1 The City of Bradford Metropolitan District Council has prepared a Supplementary Planning Document (SPD) for Householder developments as part of the Local Development Framework (LDF) for the District. The document will supersede the current House Extensions Policy and Dormer Windows Policy Supplementary Planning Guidance (SPG). The purpose of the Householder SPD is to provide clear and practical design guidance to supplement local planning policy with the following key aims:

1. Give homeowners and designers a clear basis for developing proposals, with some certainty that the final result is likely to be acceptable to the Council
2. Ensure that proposals are well designed and complement or enhance the character of the original property and the wider area
3. Protect the residential amenity of neighbours
4. Safeguard the natural environment, including trees and protected species
5. Prevent the creation of dangerous highway conditions

2.2 In particular, the document will supplement policies UDP3 (Quality of Built and Natural Environment), UR3 (Local Impact of Development) and D1 (General Design Considerations). However, the final document may also have lesser links with the following policies:

- TM12 (Parking Standards for Residential Developments)
- TM19A (Traffic Management and Road Safety)
- GB1 (New building in the Green Belt)
- GB2 (Siting of new building in the Green Belt)
- GB5 (Extension and Alteration of Buildings within the Green Belt)
- BH4 (Alteration, Extension or Substantial Demolition of listed Buildings)
- BH7 (New Development in Conservation Areas)
- NE4 (Trees and Woodland)
- NE5 (Retention of Trees on Development Sites)
- NE10 (Protection of Natural Features and Species)
- NR16 (Surface Water Run Off and Sustainable Drainage Systems)

Purpose of the Sustainability Appraisal

2.3 Sustainability Appraisal is an iterative process that identifies and reports on the likely significant effects of a policy document and the extent to which implementation will achieve the social, environmental and economic objectives by which sustainable

development can be defined. A Sustainability Appraisal aims to promote sustainable development through the integration of social, economic and environmental considerations into the preparation of planning documents and policies.¹

Compliance within the Planning Acts and Environmental Law

- 2.5 When the Council started the Sustainability Appraisal process in May 2008, Sustainability Appraisal was a requirement of The Planning and Compulsory Purchase Act 2004. However, this requirement has since been removed by the Planning Act 2008. Nevertheless, the Council have chosen to complete the process to help inform a better document and ensure compliance with European Directive 2001/42/EC, as transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004. These Regulations require Strategic Environmental Assessment (SEA) of policies, plans or programmes which are likely to have significant environmental effects.
- 2.6 The key difference between Sustainability Appraisal and SEA is that Sustainability Appraisal also covers wider social and economic effects of plans, as well as the more environmentally-focused considerations of the Directive.

¹ ODPM (2006) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

3.0 SUSTAINABILITY APPRAISAL METHODOLOGY AND SUMMARY OF OUTCOMES

3.1 In 2005, the Government published *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*, which provides guidance on how to carry out Sustainability Appraisals for new planning documents. There are several stages of the Sustainability Appraisal process; this report fulfils stages B, C and D of this process. However some of the information compiled for stage A, which has been updated, is also included in this report for completeness (refer to Sections 4 and 5).

Table 2: Stages of the Sustainability Appraisal

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope;
Stage B	Developing and refining options and assessing effects;
Stage C	Preparing the Sustainability Appraisal Report;
Stage D	Consulting on draft SPD and Sustainability Appraisal Report;
Stage E	Monitoring the significant effects of implementing the SPD.

Stage A: Setting the context, objectives and establishing the baseline

3.2 As part of the pre-production stage of the SPD, the Council has already published a Sustainability Appraisal Scoping Report, which was the first stage in the Sustainability Appraisal process. This document was then entitled the *House Extensions and Alterations* SPD, however the title of this document has since been shortened to *Householder* SPD and the objectives of the document have also been amended. The purpose of the *Sustainability Appraisal Scoping Report* was to set the context of this Sustainability Appraisal and the associated SPD by:

- Identifying other plans, policies or programmes that may influence the content of the SPD
- Collecting baseline information to inform the SPD
- Identifying issues and problems that need to be addressed when producing the SPD
- Presenting the Sustainability Appraisal Framework for appraising the SPD

3.3 The Scoping Report was published for a 5 week consultation period from 27th May 2008 until 1st July 2008. The Report was placed on the Council's website and circulated to statutory bodies which are identified in Appendix 1. A total of 3 written representations were received which highlighted no major shortcomings, however, some changes have been made to take account of the consultation responses

received. A summary of the comments received, the Councils response, and the actions taken are set out in Appendix 2.

Stage B: Developing and refining options and assessing effects

B1: Testing the SPD Objectives against the SA Framework

3.4 The purpose of the Householder SPD is to provide clear and practical design guidance to supplement local planning policy with the following key aims:

1. Give homeowners and designers a clear basis for developing proposals, with some certainty that the final result is likely to be acceptable to the Council
2. Ensure that proposals are well designed and complement or enhance the character of the original property and the wider area
3. Protect the residential amenity of neighbours
4. Safeguard the natural environment, including trees and protected species
5. Prevent the creation of dangerous highway conditions

It is these objectives that are tested against the Sustainability Appraisal Framework in Section 6.

3.5 This appraisal of the Householder SPD is based on the same *Sustainability Appraisal Framework* that was used to appraise the policies in *the Replacement Unitary Development Plan* (RUDP) for the District. It was felt more appropriate to use these objectives as the SPD is linked to 'saved' Policies contained within the RUDP. The sustainability objectives are linked to the four national sustainable development objectives as set out by Government in *A Better Quality of Life – A Strategy for Sustainable Development* (1999). These objectives are:

- Social progress which recognises the needs of everyone
- Effective protection of the environment
- Prudent use of natural resources
- Maintenance of high and stable levels of economic growth and employment

B2: Developing the SPD Options

3.6 A key requirement of the SA process is to consider reasonable alternatives as part of the assessment process. The options that have been assessed are:

- Option One - To produce a Householder SPD
- Option Two - Not to produce a Householder SPD and to let the existing House Extensions Policy SPG and Dormer Windows SPG expire

3.7 Section 8 examines the sustainability of the two options and concludes that the preferred option was to produce and adopt a new Householder SPD to replace the existing House Extensions SPG and Dormer Windows Policy SPG.

B3: Predicting the effects of the SPD

3.8 The Sustainability Appraisal provides a prediction and assessment of the potential effects of the SPD. The plan objectives were scored on a positive, neutral and negative scale against each of the 18 sustainability objectives set out in the Sustainability Appraisal Framework. Generally, the objectives of the draft SPD performed well against the sustainability objectives or had no significant relationship with them (refer to Section 7 for details).

B4: Evaluating the effects of the SPD

3.9 This report concludes that the Householder SPD will help to promote sustainability objectives, such as making urban areas more attractive through good design, enhancing townscape value, and facilitating the provision of a range of good quality housing. No significant negative impacts are foreseen, however it is acknowledged that there are some uncertainties over the potential impact upon the ability of some households to meet their housing needs, as outlined in paragraphs 7.18 – 7.19.

B5: Considering ways of mitigating adverse effects and maximising beneficial effects

3.10 No significant adverse impacts have been foreseen.

B6: Proposing measures to monitor the significant effects of implementing the SPD

3.11 It is not foreseen that the adoption of the Householder SPD will have any significant environmental effects, which require monitoring to ensure compliance with the *Environmental Assessment of Plans and Programmes Regulations 2004* (the SEA Regulations). As such, the Local Planning Authority does not propose any formal actions to monitor the environmental effects of the Householder SPD once implemented. In the unlikely event that any unforeseen adverse impacts arise the Local Planning Authority will respond in a pragmatic and timely manner.

3.12 As the requirement of Sustainability Appraisal has been removed for SPDs by the Planning Act 2008, the Local Planning Authority is no longer required by Planning Law to monitor the wider social and economic effects of the SPD. Nevertheless, the Local Planning Authority is keen to understand the impacts and the effectiveness of the Householder SPD, to help inform future revisions of the document and ensure that it is consistent with and supportive of higher level plans, policies and objectives. To enable such an assessment the Council will establish feedback channels and will convene a Working Group of Council Officers to discuss and act upon any key issues which arise, should this be necessary.

STAGE D: Consulting on draft SPD and Sustainability Appraisal Report

Please refer to Section 1 Page 2 for details of how to comment.

4.0 IDENTIFICATION OF OTHER RELEVANT POLICIES, PLANS AND PROGRAMMES

4.1 The following policies and plans were reviewed as part of the preparation of the Sustainability Appraisal Scoping Report for this SPD in May 2008. The table below lists those policies and any relevant relationships between the SPD and other strategies and sustainability objectives that have been identified. The table has been updated for this Sustainability Appraisal following consultation on the Sustainability Appraisal Scoping Report to include: *Planning Policy Statement 9: Biodiversity and Geological Conservation* and the Councils Landscape Character Assessment SPD. Updates have also been made to reflect the updating of the Districts Sustainable Community Strategy, the Councils Corporate Plan and the replacement of Planning Policy Guidance Note 15 with Planning Policy Statement 5. This information is included in this report for completeness.

Table 3: Relevant Policies, Plans and programmes

Relevant Plan, Policy or Programme	Key Objectives or requirements of relevant plan and SA	Implications for the SPD
<p>Securing the Future: Delivering UK Sustainable Development Strategy (HM Gov, 2005)</p>	<p>To enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.</p>	<p>The extension of homes is entirely compatible with the concept of sustainable development as it:</p> <ul style="list-style-type: none"> 1) Encourages the re-use and investment in the existing housing stock 2) Promotes the efficient use of land 3) Plays a vital role in meeting the housing requirements of the District's population <p>However, the SPD will play a vital role in balancing the sometimes competing interests of applicants, neighbours, the wider public and the natural environment.</p>
<p>The Planning Bill 2008 (HM Gov, 2007)</p>	<p>The Planning Bill has built on the proposals set out in the Planning White Paper and introduced a new</p>	<p>Under the Householder Permitted Development Rights, which were implemented in October 2008, fewer</p>

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	<p>system for nationally significant infrastructure planning, alongside further reforms to the town and country planning system, including reforms to Householder Permitted Development Rights.</p>	<p>house extensions and outbuildings require planning permission. However, irrespective of whether planning permission is required, the SPD aims to provide a good source of reference that will encourage sustainable design and the protection of the natural environment.</p>
<p>Planning Policy Statement 1: Delivering Sustainable Development (ODPM, 2005)</p> <p>Key principle IV and paragraphs 33 to 39 provide statements of Government policy regarding design.</p>	<p>Sustainable development through social justice, environmental protection and resource and energy management.</p> <p>The document highlights four key messages that are of particular relevance:</p> <ol style="list-style-type: none"> 1) “Good design ensures attractive, durable and adaptable places and is a key element in achieving sustainable development” 2) “Planning authorities should plan positively to for the achievement of high quality and inclusive design” 3) “Good design should contribute positively to making places better for people” 4) “Design which is inappropriate in its context...should not be accepted” 	<p>The new SPD will help and encourage householders to extend, alter and adapt their homes in a manner which meets their needs without compromising the character and quality of the area, the amenity of neighbours or highway safety.</p>
<p>Planning Policy Guidance 2: Green Belts (DCLG, 1995 (amended March 2001))</p>	<p>To safeguard the countryside, prevent unrestricted sprawl of large built up areas and the merging of neighbouring towns, preserve the setting and assist in urban</p>	<p>Consideration will be given to the inclusion of guidance specific to extensions and outbuildings within the greenbelt. If guidance is included, it will seek to minimise the</p>

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	<p>regeneration.</p> <p>PPG2 requires that extensions do not result in a disproportionate addition over and above the original building (see paragraph 3.6).</p>	<p>impact upon the greenbelt and to promote the sustainable objectives of including land within the green belt.</p>
<p>Planning Policy Statement 3: Housing (DCLG 2006)</p>	<p>Housing suitable for all, the creation of mixed communities, and re-use of buildings and land.</p> <p>In terms of design, paragraphs 12 to 19 repeat many of the statements made in PPS1. The document also stresses the need to use land efficiently but also highlights the need for private gardens, particularly in family houses.</p>	<p>The SPD will support the appropriate extension of dwellings which meet the changing needs of households and make efficient use of land. However, this should not be done at the unacceptable expense of outdoor space which is necessary for the retention of bio-diversity, the storage of waste/ recycling and the drying of laundry.</p>
<p>Planning Policy Statement 9: Biodiversity and Geological Conservation. (ODPM, 2004)</p>	<p>To ensure that biological and geological diversity are conserved, to enhance and restore the diversity of England's wildlife and geology, and enhance biodiversity in green spaces.</p>	<p>The SPD should seek to prevent the loss of bio-diversity by providing guidance on the potential negative impacts of householder developments and advising of how such impacts can be avoided</p>
<p>'Better Places to Live: A Companion Guide to PPG3: By Design' (DETR 2000)</p>	<p>To provide detailed design guidance and help deliver the design objectives of PPG3.</p>	<p>The guidance contained within this document is primarily written to guide the development of new housing. However, careful consideration will be given as to how the guidance could be modified and incorporated in to the SPD in order to promote good design.</p>
<p>Planning Policy Statement 5:</p>	<p>To conserve and enhance heritage</p>	<p>Consideration will be given to the</p>

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<p>Planning for the Historic Environment (DCLG, 2010)</p>	<p>assets and maintain and strengthen the commitment to stewardship of the built environment.</p>	<p>inclusion of guidance specific to Conservation Areas and Listed Buildings. If included, any such guidance will seek to encourage the appropriate reuse and adaptation of the built historic environment in a sensitive and sustainable manner.</p>
<p>Planning Policy Statement 22: Renewable Energy (ODPM, 2004)</p>	<p>To promote and encourage, rather than restrict, the development of renewable energy resources.</p>	<p>Consideration will be given to providing guidance on micro generation technologies. If guidance is included, it will encourage the use of micro generation technologies in appropriate localities.</p>
<p>Planning Policy Statement 25: Flood Risk (DCLG, 2006)</p>	<p>To ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.</p>	<p>Consideration will be given to including guidance which:</p> <ol style="list-style-type: none"> 1) Seeks to minimise run-off from extensions, outbuilding and hardstandings 2) Encourages or requires the incorporation of design measures which prevent or limit flood damage to extensions and outbuildings
<p>Lifetime Homes, Life Time Neighbourhoods: A National Strategy for Housing in an Aging Society (DCLG, 2008)</p>	<p>To ensure that new housing is designed to meet changing needs as people grow older.</p>	<p>The new SPD will encourage or require the incorporation of Lifetime Homes Standards into extensions to improve their durability and adaptability.</p>
<p>Bradford District RUDP (CBMDC, 2005)</p>	<p>Provides the current planning framework for the Bradford District. The overall aim of the Plan is to “promote a more sustainable</p>	<p>The SPD will provide practical design guidance which supplements ‘saved’ RUDP policies and encourages sustainable design, the</p>

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	district”.	protection of bio-diversity and the appropriate extension of dwellings in line with the aim and objectives of the RUDP. (Note: The higher level policy which the SPD will be linked to has already been subject to a Sustainability Appraisal.)
Sustainable Design, Supplementary Planning Document (CBMDC, 2006)	The Sustainable Design SPD provides practical guidance on how sustainable design principles can be incorporated into new builds, extensions and conversions.	The new SPD will be clearly and comprehensively cross referenced to the existing guide throughout. Consideration will also be given to the inclusion of further guidance which is specifically tailored to house extensions.
Landscape Character, Supplementary Planning Document (CBMDC 2008)	The Landscape Character SPD provides detailed guidance on key character areas and their characteristics, and guidance for managing development and change within them. The SPD supports the saved policies NE3 and NE3A in the adopted Replacement UDP (2005).	The new SPD will be cross referenced to the Landscape Character SPD.
Tree Protection, Supplementary Planning Document (CBMDC, Forthcoming)	The forthcoming guidance will provide practical guidance on the protection of trees.	The new SPD will be clearly cross referenced to the Tree Protection SPD (if adopted prior to the House Extensions Policy).
Revised House Extensions Policy Supplementary Planning Guidance (CBMDC, 2003)	This document provides the Council’s existing house extensions Supplementary Planning Guidance. The document provides general and	The new SPD will have a stronger emphasis on supporting the principles of sustainable development and sustainable

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	specific guidance	design.
Dormer Windows Policy Supplementary Planning Guidance (CBMDC, 1994)	This document provides the Council's existing house extensions Supplementary Planning Guidance. The document provides general and specific guidance	The new SPD will have a stronger emphasis on supporting the principles of sustainable development and sustainable design.
Joint Housing Strategy for Bradford 2003-2010 (CBMDC & Bradford Housing Partnership)	<i>'Offer everyone who needs it a home in a sustainable neighbourhood'</i> Key Objectives: 1) Increase supply 2) Improve quality of housing stock 3) Ensure vulnerable people are supported to live independent lives	The SPD will support the objectives of the JHS. In particular it will support investment in the existing housing stock and promote the extension and alteration of homes in a manner which meets the needs of occupiers whilst maintaining or enhancing the amenity of neighbours and the visual quality of neighbourhoods.
Bradford District 2020 Vision (Bradford Vision, 2000)	Provides a framework to promote and improve the social, economic and environmental well-being of present and future generations within the Bradford District.	The extension of homes is entirely compatible with the concept of sustainable development, as such, the SPD will help meet the aspirations of the 2020 Vision.
The Big Plan for the Bradford District 2008-2011: Our Sustainable Community Strategy	Provides the framework to create a good quality of life for everyone by maintaining and improving social, environmental and cultural wellbeing.	The appropriate extension of homes is compatible with and will contribute towards the implementation of the Sustainable Community Strategy.
Citizens First, Bradford Council's Corporate Plan 2007/2010	The priorities are: educating and supporting children, creating a more	The Corporate Strategy is consistent with the objectives of sustainable

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<p>(CBMDC, 2007)</p>	<p>prosperous District, creating safer and stronger communities, improving the environment, improving the health of communities and enhancing choice for older people, and improving customer services.</p>	<p>development. In particular, the SPD will support stronger and stable communities by encouraging the adaptation of homes and promoting investment in the existing housing stock.</p>
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5.0 BASELINE INFORMATION AND IDENTIFICATION OF ISSUES

Introduction

5.1 The SEA Directive and good practice guidance require baseline information on which to assess the impacts and effectiveness of policies and plans to be included in the Scoping Report. Comprehensive baseline information is being developed as part of the emerging *Sustainability Appraisal Framework* for the LDF, which was presented for public consultation in February 2007. More detailed, wider ranging and area specific data, relevant to this SPD can also be found in the Bradford District Local Housing Assessment (2007) and Bradford District Settlement Profiles Study (2007) which should also be referred to, if necessary.

Population

5.2 The population of the District is estimated at 493,000² with the majority residing in the urban centers of Bradford, Shipley, Baildon and the freestanding towns of Bingley, Keighley and Ilkley. The remaining population lives in villages, of varying sizes, within the more rural areas of the District. The District is multicultural with 22% of the population of ethnic minority origin other than White³.

5.3 Bradford District has a growing population; based on ONS population projections this is anticipated to grow by 109,700 to 594,300 by 2029⁴. Bradford's projected increase is largely driven by the District's Black and Minority Ethnic communities and its youthful population structure, which is expected to continue to produce many more births than deaths over the next 25 years. The largest increases are expected in the working age population and the very elderly age groups.

5.4 Despite the overall predicted increases in the population of the District, there is a trend towards counter-urbanisation whereby higher income households choose to live in attractive rural and semi-rural locations across West Yorkshire⁵. The loss of higher income households has led to an urban core characterised by an increased concentration of deprived, lower income households.

² ONS (2006) Estimate

³ ONS (2001) Census

⁴ ONS (2004) Population Projections

⁵ BMDC (2008) Local Housing Assessment

5.5 Key Sustainability Issues:

- The need to allow and promote the extension and alteration of homes to meet the needs of growing, extended and large families
- The need to allow and promote the extension and alteration of homes to meet the needs of the elderly and disabled
- The need to create mixed and stable communities which retain their more affluent members

Housing and Urban Fabric

5.6 There are over 200,000 household spaces and 180,000 households across the District⁶. Although the tenure, condition, type, size of households, size of properties and price vary considerably across the District, when taken as a whole, Bradford has:

- A high proportion of unfit privately owned properties, particularly within the urban core
- Housing stock that is older than the national profile
- A high proportion of terraced dwellings and low proportion of detached dwellings when compared to the national profile
- Larger than average households when compared to the national profile
- Households with fewer rooms per person than the national profile

5.7 Key Sustainability Issues:

- The need to accommodate large families and growing families, particularly those on low incomes
- The need to encourage the renovation, reuse and maintenance of the existing housing stock
- The need to ensure that extensions and alterations achieve higher standards in terms of resource efficiency and lifetime flexibility
- Difficulties in substantially extending terraced and other dwellings that are located within densely packed urban neighbourhoods

Employment, Income and Deprivation

5.8 The rate of unemployment in Bradford in March 2006 (Claimant Count) was 3.5% compared to 3.0% in West Yorkshire and 2.7 % in the UK. However, despite the development of new industries the Bradford district still remains a low wage, low skill economy with higher than average levels of unemployment.

⁶ ONS (2001) Census

5.9 Probably the most comprehensive measure of economic well being in the District is The Index of Multiple Deprivation 2004, which takes a measure of deprivation based on multiple indicators. Overall Bradford is the 5th most deprived local authority on income deprivation and the 6th most deprived on employment deprivation. Over 190000 people (42% of the District's population) live in Wards that fall within 10% most deprived Wards in the country.

5.10 Key Sustainability Issues:

- The need to accommodate large families and growing families, particularly those on low incomes
- The need to improve the quality of the existing building stock
- The need to reduce the energy consumption and running costs of the existing housing stock to alleviate fuel poverty
- The need to encourage stable and mixed communities which retain their more affluent members

Heritage Assets

5.11 Bradford has over 5800 buildings listed by the Secretary of State as being of 'special architectural or historic interest', these range from large industrial mill complexes to weaver's cottages and from agricultural farmsteads to stately halls and manor houses. There are also 59 Conservation Areas and the Saltaire World Heritage Site.

5.12 The Council has a lot of baseline information relating to the District's built heritage including comprehensive Conservation Area Assessments, Conservation Area Appraisals and listed building condition surveys.

5.13 Key Sustainability Issues:

- The need to protect or enhance the District's built heritage for future generations
- The need to allow the extension and alteration of homes, to meet the needs of households, without compromising the historical or architectural quality of the building or the wider character of the locality

Biodiversity and Trees

5.14 House extensions are unlikely to significantly affect locally or nationally designated areas such as Wildlife Corridors, historic woodlands or Sights of Special Scientific Interest. However, gardens and built structures may house or provide feeding grounds for

protected species (such as bats and wild birds), species of principal importance for the conservation of biodiversity or trees that are of amenity and bio-diversity value.

5.15 Key Sustainability Issues:

- Protection of bio-diversity, in particular protected species and species of principle importance for the conservation of biodiversity and mature trees
- The need to encourage householders to build-in bio-diversity features as part of good design

Use of resources

5.16 Household energy use accounts for more than a quarter of all energy used in the UK, with further energy consumed during the manufacture, extraction and transport of materials and the construction of buildings, including extensions⁷. Within households, the majority of energy consumed is used to heat space and water with lesser amounts being used for appliances, lighting and cooking.

5.17 The Government have implemented a number of initiatives to increase the energy efficiency of the existing housing stock, including for example, grants for cavity wall and loft insulation. However, much more could still be done and house extensions have the potential to improve the energy performance of the entire dwelling through increased solar gain, thermal efficiency, water management and the incorporation of micro generation technologies. In addition, house extensions provide an opportunity to utilise sustainable building materials.

5.18 Key Sustainability Issues:

- The need to encourage energy efficient, adaptable and durable design
- The need to encourage the use of sustainable building materials
- The need to encourage the use of micro-generation technologies in appropriate localities
- The need to encourage the reuse of the existing housing stock

⁷ HM Gov (2007) Energy White Paper

Identification of Key Issues by Sustainable Development Objectives

Social Progress which recognises the needs of everyone

- 5.20 In terms of social progress and meeting the needs of the District's population, the house extensions and alterations, such as dormer windows, play a significant role. However, within the Bradford District, due to the young and growing population and a high number of large households, they play a particularly important role in meeting the needs of householders within the means available to them. However, one of the challenges identified is to ensure that new extensions are durable and can, wherever possible, be easily adapted to meet future needs (for example, should a household member become unable to climb stairs).
- 5.21 The District's Local Housing Assessment has identified a trend towards the migration of more affluent residents from the inner cities and built up areas into more attractive, rural and semi-rural areas. This may be a difficult to reverse, however the extension and alteration of homes has some potential to encourage the creation of less transient, safer and more economically diverse communities that invest in their housing and neighbourhoods and retain their more affluent residents.
- 5.22 Nevertheless, in assessing house extensions, there is often a balance between the needs and desires of the applicant, the amenity of neighbours and the quality of the built environment. In many cases, large extensions to terraced dwellings (which Bradford has a high proportion of) will be unacceptable and a key role of the forthcoming SPD will be to ensure one person's needs are not met at the unacceptable expense of their neighbours' amenity or the wider quality of the built environment.

Effective protection of the environment

- 5.23 The extension, adaptation and renovation of homes protects the natural environment by making efficient use of the existing housing stock and urban land, thus reducing the need for new homes to be built on greenfield land. However, there may be cases where important trees, protected species and species of principle importance would be adversely affected.
- 5.24 In terms of protecting the District's rich and diverse built heritage, it is essential to ensure that important buildings continue to be used and maintained. By allowing their sensitive adaptation and extension, historic buildings will remain in use and in good condition. However, the District's built heritage is a finite resource and it is imperative that current

needs are not met at the expense of future generations or the historical or architectural quality of the building or the wider character of the locality.

Prudent use of natural resources

- 5.25 The extension and adaptation of the District's housing stock makes excellent use of existing natural resources and provides an opportunity to utilise sustainable materials. However, there is further potential for extensions to improve the energy performance of the entire dwelling through increased solar gain, thermal efficiency and the incorporation of micro generation technologies.

Maintenance of high and stable levels of economic growth and employment

- 5.26 The construction of house extensions undoubtedly creates many jobs for local trades people and suppliers. By encouraging the appropriate extension and alteration of homes and the use of local materials, the SPD will support local employment.

6.0 SUSTAINABILITY APPRAISAL FRAMEWORK: OBJECTIVES AND INDICATORS

6.1 The tables below show the Sustainability Appraisal Framework that was used for the appraisal of the policies in the Replacement UDP (2005). To ensure consistency, the same framework has been used to appraise the SPD.

Table 4: A - EFFECTIVE PROTECTION OF THE ENVIRONMENT

	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
1	Built Environment and Urban Land Use	<ul style="list-style-type: none"> ♦ Make urban areas more attractive through good design. ♦ Make full and effective use of land and buildings in urban areas. 	<ul style="list-style-type: none"> ♦ Promote use of previously developed sites. ♦ Promote reuse and maintenance of existing buildings. ♦ Promote effective use of existing infrastructure. ♦ Promote good quality design/enhance appearance of places. 	<ul style="list-style-type: none"> ♦ Is the site Greenfield or brownfield? ♦ Is the site vacant or underused? ♦ Would it potentially create an attractive environment for living and working? ♦ Would development on the site increase the potential for existing buildings and structures (whether listed or not) to be refurbished and reused? ♦ Is it close to existing built form and infrastructure (e.g. services such as water, sewers, education and health)? Would it make use of spare capacity or help pay for its renewal?
2	Cultural Heritage	<ul style="list-style-type: none"> ♦ Enhance townscape value and add to the cultural legacy of the District, through quality new development. ♦ Safeguard buildings, areas, landscapes and features of historic and archaeological importance and their setting. 	<ul style="list-style-type: none"> ♦ Conserve the character of cities, town and villages. ♦ Protect features and promote development of a higher townscape quality. ♦ Preserve listed buildings, other historic buildings of local importance, and preserve and enhance conservation areas and historic parks and gardens. ♦ Preserve ancient monuments and other archaeological sites. 	<ul style="list-style-type: none"> ♦ Would the setting or character of archaeological sites (including potential sites), listed buildings, conservation areas, Registered Parks and Gardens and Registered Battlefields, within or adjacent to the site, be safeguarded? ♦ Would any historic or townscape features be safeguarded? ♦ Is the site unsightly now and would its development enhance the townscape value and general character of the area?

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	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
3	Open Space	<ul style="list-style-type: none"> ♦ Improving cultural, recreation and leisure facilities. ♦ Protect and enhance existing areas of open space. ♦ Promote additional open space provision and expand green networks. 	<ul style="list-style-type: none"> ♦ Promote the development of cultural, recreation and leisure facilities. ♦ Protect and improve the quality of existing open space. ♦ Promote new provision of open space and improved green networks and linkages which area accessible. 	<ul style="list-style-type: none"> ♦ Is the site of recreation or open space value? ♦ Is the site within an area of deficiency? (See Open Space Audit 1998). ♦ Is there existing open space provision within reasonable access? Appropriate thresholds are: <ul style="list-style-type: none"> - Allotments/shared external space 200 m - Playground and local green space 400 m - Park 600 m - Natural green space (20Ha +) 2Km/25Min walk - Open country or green lung (200Ha +) 5Km/20 mins by bike. (LGMB 1995) ♦ Does the site provide the opportunity to make a contribution to open space or green network provision?
4	Health and Safety	<ul style="list-style-type: none"> ♦ Increase safety and sense of security, and reduce nuisance from noise and odour. ♦ Improve road safety and design of cycling and walking facilities. 	<ul style="list-style-type: none"> ♦ Increase pedestrian and personal safety. ♦ Guide noise-sensitive development, noisy development, and noisy sports to appropriate locations. ♦ Reduce nuisance from noise and odour. ♦ Conserve and promote recreational facilities. ♦ Improve local air quality. ♦ Promote design measures on security and 	<ul style="list-style-type: none"> ♦ Is the site close to sources of excessive noise or smell? ♦ Is the development likely to cause excessive levels of noise or smell, through the nature of the activity? ♦ Does the site provide the opportunity to promote increased safety and security through design? ♦ Does the site protect and add to recreational open space provision? (See 3 above).

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	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
			<p>sense of security.</p> <ul style="list-style-type: none"> Promote road safety, in particular the design of cycling and walking facilities. 	
5	Countryside / Rural Areas	<ul style="list-style-type: none"> Protect and enhance designated areas, enhance general landscape quality, retain countryside and open land. 	<ul style="list-style-type: none"> Protect/enhance the open countryside, open land and Green Belt. Conserve/promote improved landscape quality and character. Conserve/enhance key habitats including wet grasslands, meadows, upland heaths, blanket bogs and woodland and hedge cover. Conserve/protect designated areas. 	<ul style="list-style-type: none"> Is it part of the open countryside? Is the site within or adjacent to valued landscapes, either designated nationally or locally defined such as Special Landscape Areas? Are there any significant landscape features within or adjacent to the site, such as trees and hedges etc? Which landscape area and type does the site fall into in the landscape assessment? Is the proposed development compatible with the landscape? From the assessment can the landscape absorb the proposed development? Does the development of the site safeguard a reasonable level of access to open countryside for people of the neighbourhood?
6	Water Quality, Resources and Supply	<ul style="list-style-type: none"> Promote the efficient use of water, and safeguard water resources from damage or disruption. 	<ul style="list-style-type: none"> Promote the re-use/resource efficient recycling of water. Protect the chemical and biological quality of watercourses and canals. Conserve/protect natural river systems and flood plains. Maintain groundwater quality and quantity and river levels. 	<ul style="list-style-type: none"> Does the site avoid areas susceptible to flooding, and avoid exacerbating problems of excessive surface water runoff? Is it located where there is spare capacity in the water supply system? Is it located where there is spare capacity in the surface and foul water drainage system?

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	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
7	Air Quality	<ul style="list-style-type: none"> ♦ Safeguarding the air from, and reducing pollution in the air. 	<ul style="list-style-type: none"> ♦ Limit or reduce global and local pollutants including CO₂, SO₂, methane and nitrogenoxide. 	<ul style="list-style-type: none"> ♦ Is the site subject to excessive levels of air pollution, beyond that which can be solved by good design? ♦ Is the development liable to cause excessive levels of air pollution, or danger for people in the vicinity, either directly through the nature of its activity or indirectly because of traffic generated?

Table 5: B - PRUDENT USE OF NATURAL RESOURCES

	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
8	Agriculture, Forestry and Soil	<ul style="list-style-type: none"> ♦ Safeguard soil and the best and most versatile agricultural land, reduce contamination and dereliction, and safeguard/promote new woodland cover. ♦ Safeguard the District's potential or local food production. 	<ul style="list-style-type: none"> ♦ Conserve the quality of the land, soil and agricultural land in particular the best and most versatile, but also lower grade agricultural land e.g. in hill and upland areas where agricultural practices make a contribution to the environment. ♦ Promote the remediation of contaminated land and the reduction of dereliction. ♦ Promote effective use of urban land resources (e.g. increasing densities) so reducing need for Greenfield sites. ♦ Promote good quality mineral extraction restoration. ♦ Protect existing tree cover and promote appropriately located new tree planting. ♦ Conserve geological sites. ♦ Protect allotments. 	<ul style="list-style-type: none"> ♦ Does the site reuse/reclaim derelict or contaminated land? ♦ Is the land of agricultural, or forestry value? ♦ Does it avoid areas of high intensity local food production (including allotments) and land which is being farmed/cultivated organically? ♦ Does it avoid the best and most versatile soil? ♦ Is it a site of geological value? ♦ Will the development contribute to extending woodland/tree cover in an appropriate location?
9	Biodiversity	<ul style="list-style-type: none"> ♦ Value and protect the diversity of nature while increasing general wildlife potential. 	<ul style="list-style-type: none"> ♦ Protect designated nature conservation sites and protected species. ♦ Conserve important wildlife habitats. ♦ Enhance wildlife potential with habitat retention and protection. ♦ Promote diversity of wildlife and ecosystems. 	<ul style="list-style-type: none"> ♦ Does the proposed development impact on protected wildlife areas or other rare, vulnerable or locally valued habitats or species? ♦ Are woods and copses conserved, especially those that may have a role as wildlife habitats? ♦ Does the site contain any other wildlife features e.g. ponds?

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	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
				<ul style="list-style-type: none"> ♦ Could the development promote wildlife diversity by enhancing green corridors or creating new habitats? ♦ Would the development process enable the conservation of existing sites of ecological value?
10	Minerals	<ul style="list-style-type: none"> ♦ Reduce consumption of minerals and increase the re-use and recycling of minerals. 	<ul style="list-style-type: none"> ♦ Manage the extraction of minerals in appropriate locations. ♦ Reduce consumption of minerals. ♦ Promote re-use/resource efficient re-cycling of materials. ♦ Promote recycling facilities. 	<ul style="list-style-type: none"> ♦ Are potentially recyclable or virgin mineral resources safeguarded?
11	Waste	<ul style="list-style-type: none"> ♦ Promote a move up through the waste management hierarchy to minimise waste, reuse or recover through recycling, composting or energy recovery and sustainably dispose of what is left at a local level. 	<ul style="list-style-type: none"> ♦ Promote re-use/resource efficient recycling of materials. ♦ Reduce waste arising. ♦ Promote recycling facilities. 	<ul style="list-style-type: none"> ♦ Is the site needed for waste disposal?
12	Energy	<ul style="list-style-type: none"> ♦ Reduce energy consumption and encourage the use of renewable sources of energy. 	<ul style="list-style-type: none"> ♦ Promote renewable energy generation e.g. wind, water, solar and biomass. ♦ Encourage energy efficient urban forms. ♦ Increase energy efficiency of buildings (e.g. materials, insulation, CHP etc). ♦ Promote sustainable design principles in site location and layout, which utilise solar gain. 	<ul style="list-style-type: none"> ♦ Is the site in a sheltered location and does it avoid 'frost pockets' and exposed hillcrests? ♦ Is the site in the vicinity of existing development so as to benefit from 'heat island' effects and facilities later introduction of CHP/district heating? ♦ Is the site flat or gently sloping to the south, so as to maximise solar gain and does it avoid north facing slopes or locations which have strong potential for other

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	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
13	Transport - Movement	<ul style="list-style-type: none"> Minimising the total amount of motorised travel required (number of trips/distance). 	<ul style="list-style-type: none"> Minimise the need to travel by appropriate location of significant trip generator to facilitate multi purpose trips or in close proximity to users. 	<p>forms of renewable energy?</p> <ul style="list-style-type: none"> Will the development generate significant trips? If for service or employment, is the development embedded within (or at least close to) residential areas? In order that a good proportion of users are within walking distance and a major proportion within cycling distance. If a local facility, is it located on the main local bus route and clustered with other local facilities? If a district facility, is it located at a public transport node affording easy access from all the nearby areas? If for warehousing or manufacturing is it located close to the main road system and with existing/potential access by rail or water? Is there reasonable road access to the site without exceeding the physical or environmental capacity of the network?
14	Transport - Mode	<ul style="list-style-type: none"> Increase the proportion of all journeys made by non-vehicular modes (walking, cycling and public transport) and promote the provision of an integrated transport network. 	<ul style="list-style-type: none"> Encourage the use of non-vehicular transport through the location, scale and design of new development. Conserve and promote the provision of quality facilities for public transport, cyclists and walkers. Reduce private non-residential car parking. 	<ul style="list-style-type: none"> Is the development well served by existing/potential walking and cycling routes to local facilities? Is it within easy walking distance of public transport routes, which give direct access to a good range of local and regional facilities? (Bus stop within 400 m of each home/railway station within 800 m). Would the development allow for the improvement or upgrading of public transport services? Is the site within walking or cycling distance of facilities? (See criteria 5).

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	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
15	Access	<ul style="list-style-type: none"> Improving access to facilities, services, buildings, open space and other people, not just those with cars. 	<ul style="list-style-type: none"> Conserve and promote accessibility in both urban and rural areas to a range of facilities and services, including local shops and financial services (banks & post offices), health facilities, open space and countryside. Promote access to a range of job opportunities, training and education. Improve access to public transport. Promote cycle and walking facilities. Reduce severance by roads and other development. Enhance, maintain and promote the 'rights of way' networks. 	<ul style="list-style-type: none"> How close is the development to major employment centres by comparison with recommended accessibility thresholds? (Potential thresholds are 5 Km from centre for cycling and 1.5 Km from centre for walking (LGMB1995)). Is the site within an area with a reasonable job ratio? (Job Ratio is the number of jobs in an area by number of people working/seeking work, calculated for several wards within an urban area or on a ward in other areas. (Desirable job ratio ->0.7). How close is the site to local and district facilities and will it improve their viability/range/quality? Shopping: District centre 1.5 Km walking distance. Local centre 400 m walking distance (Recognising barriers to movement). Education: Primary school 400 m walking distance. Secondary school 1.5 Km walking distance/good access by public transport. Open space (See criteria 3 above). Is there a right of way on the site?

Table 6: C - SOCIAL PROGRESS THAT MEETS THE NEEDS OF EVERYONE

	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
16	Equity and Equality of opportunity	<ul style="list-style-type: none"> ♦ Planning to meet the needs of the whole community and promote greater social equity. 	<ul style="list-style-type: none"> ♦ Promote equality in use and accessibility of facilities. ♦ Take account of and provide for the needs of ethnic minorities, disabled, elderly and young people. ♦ Reduce disadvantages to different groups. ♦ Promote local needs. 	<ul style="list-style-type: none"> ♦ Does the site have the potential to meet local needs for affordable housing? ♦ Does the site provide potential job opportunities to disadvantaged? Is it accessible to disadvantaged areas by public transport?
17	Housing	<ul style="list-style-type: none"> ♦ Facilitate provision of a range of good quality housing to meet all needs, at a reasonable cost. 	<ul style="list-style-type: none"> ♦ Promote affordable housing. ♦ Promote a mix of housing to meet a range of needs. ♦ Promote housing, which meets local needs. ♦ Promote housing for local workforce. 	<ul style="list-style-type: none"> ♦ Would the development meet a need for housing (is the site allocated for housing or would it include an element of housing, on mixed developments)?

Table 7: D - MAINTENANCE OF HIGH AND STABLE LEVELS OF ECONOMIC GROWTH AND EMPLOYMENT

	Sustainability Criteria	Objectives	Application to UDP	Key Indicators of Impact for Development Proposals
18	Employment / Local Economy	<ul style="list-style-type: none"> ♦ Increases job opportunities throughout the District and provide opportunities for economic regeneration and growth. 	<ul style="list-style-type: none"> ♦ Promote job creation by facilitating employment generating development. ♦ Promoting diversity of economy. ♦ Promote employment and training opportunities for all. ♦ Protect and enhance of employment in local centres. 	<ul style="list-style-type: none"> ♦ Is the site proposed for an employment use? ♦ Would the development result in a loss of employment land or building?

7.0 TESTING THE SUPPLEMENTARY PLANNING DOCUMENT OBJECTIVES AGAINST THE SUSTAINABILITY FRAMEWORK AND PREDICTING AND EVALUATING THE LIKLEY EFFECTS OF THE DRAFT SPD

7.1 The objectives set out in the SPD indicate what the Council is trying to achieve through the implementation of the Policies set out in the Replacement Unitary Development Plan (2005). An assessment of the compatibility between the 5 SPD Objectives and the SA Objectives is displayed in Table 2 below.

Table 8: Comparing the SPD Objectives and the SA Objectives

SUSTAINABILITY OBJECTIVES		SPD OBJECTIVES					
		1	2	3	4	5	
Effective Protection of the Environment	1: Built Environment & Urban Land Use	✓	✓	✓	✓?	●	
	2: Cultural Heritage	✓	✓	✓	✓	●	
	3: Open Space	●	●	●	●	●	
	4: Health and Safety	✓	●	●	●	✓	
	5: Countryside/Rural Areas	✓?	✓?	●	✓?	●	
	6: Water Quality, Resource and Supply	✓	●	●	✓	●	
	7: Air Quality	●	●	●	●	●	
	Prudent use of natural resources	8: Agriculture, Forestry and Soil	✓	●	●	✓	●
		9: Biodiversity	✓	●	●	✓	●
		10: Minerals	●	●	●	●	●
		11: Waste	●	●	●	●	●
		12: Energy	●	●	●	●	●
		13: Transport - Movement	●	●	●	●	●
		14: Transport – Mode	●	●	●	●	●
	Social progress	15: Access	●	●	●	●	●
		16: Equality and Equality of Opportunity	●	●	●	●	●
		17: Housing	✓	✓	✓	●	●
	Economic Growth	18: Employment and Local Economy	●	●	●	●	●

<u>Key</u>	
✓ Significant beneficial impact	✓? Potential unknown beneficial impact
● No relationship or significant impact	
X Significant adverse impact	X? Potential unknown adverse impact

Objectives:

1. Give homeowners and designers a clear basis for developing proposals, with some certainty that the final result is likely to be acceptable to the Council
2. Ensure that proposals are well designed and complement or enhance the character of the original property and the wider area
3. Protect the residential amenity of neighbours
4. Safeguard the natural environment, including trees and protected species
5. Prevent the creation of dangerous highway conditions

Evaluating the Significance and Magnitude of the Predicted Impacts

Effective Protection of the Environment

Sustainability Criterion 1: Built environment and urban land use

Significance and Magnitude of Impacts

7.2 As table 2 shows SPD objectives 1, 2 and 3 make a significant positive contribution towards Sustainability Criterion 1 and the underlying objectives set out in the Sustainability Appraisal Framework. It is also considered that SPD objective 4 may make some contribution towards this objective by helping to safeguard trees and other natural features that often make a positive contribution to the built environment. Objective 5 of the SPD is not considered to have any significant relationship with Sustainability Criterion 1.

Sustainability Criterion 2: Cultural heritage

Significance and Magnitude of Impacts

7.3 The Householder SPD is designed to apply to all common house types, however it is noted that special requirements may apply within Conservation Areas and for any works to Listed Buildings. Nevertheless, objectives 1, 2, 3, and 4 support the aspirations of sustainability criterion 2, in that the document seeks to maintain or enhance the contribution which existing houses and trees make to the townscape and the cultural heritage of the District. Objective 5 of the SPD is not considered to have any significant relationship with sustainability criterion 2.

Sustainability Criterion 3: Open space

Significance and Magnitude of Impacts

7.4 Open space has been taken to mean large areas of open space, such as playing fields and parks, which the public normally have access to. As such, it is not considered that there is any significant link between any of the SPDs objectives and sustainability criterion 3.

Sustainability Criteria 4: Health and safety

Significance and Magnitude of Impacts

7.5 The most significant relationship between sustainability criterion 4 is with SPD objective 5, which seeks to prevent dangerous highway conditions. However it is also considered that SPD objective 1 makes a significant but less obvious contribution, since by providing clear guidance it is less likely that dangerous highway conditions will arise. Although SPD objective 3 would appear to support objectives, such as reducing noise nuisance and odour, the document does not provide guidance with respect to these issues, therefore it is not considered that this SPD objective makes any significant contribution towards the aspirations of Sustainability Criterion 4. Objectives 2, 3 and 4 of the SPD have no significant relationship with Sustainability Criterion 4.

Sustainability Criteria 5: Countryside/rural areas

Significance and Magnitude of Impacts

7.6 As many of the Districts homes are located within the countryside/ rural areas, it is considered that SPD objectives 1, 2 and 4 will make some contribution towards the

objectives of sustainability criterion 5. This will be done by preventing the disproportionate extension of homes within the greenbelt; ensuring that householder developments are sensitive to the character of rural areas; and, seeking to protect trees within gardens that may make a positive contribution to the wider character of the landscape. SPD objectives 3 and 5 are not considered to have any significant relationship with sustainability criterion 5.

Sustainability Criterion 6: Water quality, resource and supply

Significance and Magnitude of Impacts

7.7 SPD objectives 1 and 4 make a positive contribution towards the objectives of sustainability criterion 6, as the document provides householders with guidance that promotes permeable hard surfaces and discourages the use of hard surfaces which drain directly into sewers. It is not considered that SPD objectives 2, 3 and 5 have any significant relationship with sustainability criterion 6.

Sustainability Criterion 7: Air quality

Significance and Magnitude of Impacts

7.8 It is not foreseen that the Householder SPD will have any significant impact upon air quality.

Prudent Use of Natural Resources

Sustainability Criterion 8: Agriculture, forestry and soil

Significance and Magnitude of Impacts

7.9 The Householder SPD provides brief guidance regarding the protection of trees, which is primarily included for completeness. Even though the guidance does not substantially expand on RUDP policy, it is considered that SPD objectives 1 and 4 and the guidance contained within the documents are likely to have a beneficial impact because its inclusion will make it more likely that trees issues are considered before Applicants/ Agents submit applications.

Sustainability Criterion 9: Biodiversity

Significance and Magnitude of Impacts

- 7.10 SPD objective 4 and the guidance provided within the proposed SPD are likely to have a significant positive impact upon sustainability criterion 9. This is because the guidance expands on RUDP Policies, particularly in relation to bats which can be harmed by householder developments. SPD objective 1 is also considered to have a significant impact because by providing Agents/ Applicants with clear guidance, it more likely that issues such as bio-diversity will be considered from the outset.

Sustainability Criterion 10: Minerals

Significance and Magnitude of Impacts

- 7.11 The proposed SPD encourages the use of matching materials, such as sandstone which is commonly found throughout the District. However, given that the use of matching materials would almost certainly be required by the Council, even in the absence of specific guidance, it is not considered that the SPD in itself has any significant impact on mineral extraction or reserves.

Sustainability Criterion 11: Waste

Significance and Magnitude of Impacts

- 7.12 None of the SPD objectives are considered to have any significant relationship with sustainability criterion 11.

Sustainability Criterion 12: Energy

Significance and Magnitude of Impacts

- 7.13 None of the SPD objectives are considered to have any significant relationship with sustainability criterion 12.

Sustainability Criterion 13: Transport – movement

Significance and Magnitude of Impacts

- 7.14 None of the SPD objectives are considered to have any significant relationship with sustainability criterion 13.

Sustainability Criterion 14: Transport – mode

Significance and Magnitude of Impacts

- 7.15 None of the SPD objectives are considered to have any significant relationship with sustainability criterion 14.

Social Progress which Recognises the Needs of Everyone

Sustainability Criterion 15: Access

Significance and Magnitude of Impacts

- 7.16 None of the SPD objectives are considered to have any significant relationship with sustainability criterion 15.

Sustainability Criterion 16: Equity and equality of opportunity

Significance and Magnitude of Impacts

- 7.17 It is not considered that the SPD objectives will have any significant negative or positive impact on equality. Refer to the Draft Equalities Impact Assessment for further consideration and analysis of equality issues.

Sustainability Criteria 17: Housing

Significance and Magnitude of Impacts

- 7.18 Overall the Householder SPD will have a significant positive impact upon sustainability criterion 17 because the document seeks to encourage the appropriate extension of homes which will in turn help to meet the Districts needs for good quality housing. However, it is acknowledged that SPD objectives 2, 3 and 4 could potentially be seen to also have some negative impacts upon the ability of a family to meet their housing needs within the financial means available to them or without having to move house. Each of the issues is discussed in greater detail below:
- In seeking to fulfil objective 2, the construction of extensions, dormer windows or outbuildings may cost more, particularly if expensive materials are required. As a result, some people may struggle to meet their housing needs within the financial means available to them.

- In seeking to fulfil objective 2, the Council are likely to require that the size of some proposed extensions, dormer windows or outbuildings are reduced, or in some circumstances may decide that no extensions at all ought to be allowed. As a result, some people may not be able to meet their housing needs without moving home.
- In seeking to fulfil objective 3, the Council are likely to require that the size of some proposed extensions or outbuildings are reduced. As a result, some people may not be able to meet their housing needs without moving home or building two separate extensions at greater cost.
- In seeking to fulfil objective 4, it will sometimes be necessary to restrict an Applicant from carrying out certain developments that would be harmful to the natural environment. For example, the size of an extension may need to be reduced to protect the roots of an important tree from damage. By insisting upon a reduction in the size of an extension, or not allowing any extension to be built, the Council may prevent an Applicant from meeting their needs without moving home.

7.19 It is important that the issues identified above are considered within the wider planning context. In the case of house extensions and alterations, the Council is required to balance the needs or desires of individual applicants (e.g. a large extension to accommodate a disabled person or a growing family) with those of neighbours' (e.g. the safeguarding or reasonable daylight and outlook) and issues of wider public interest (e.g. the impact of a proposal on the character and appearance of the property and wider area). In the absence of a valid SPD, there are likely to be inconsistencies in the application of higher level planning policy across the authority with some Planning Officers and Members exercising more restrictive judgement and others opting for less exacting standards than those set by the proposed SPD. Consequently, it is not possible to specifically identify any significant negative or positive impacts upon householders seeking large extension and alterations to meet their housing needs. Overall, it is considered that the document strikes a reasonable and fair balance between the issues identified above, which is compatible with the aspirations of higher level planning policy.

Maintenance of High and Stable Levels of Economic Growth and Employment

Sustainability Criterion 18: Employment/local economy

Significance and Magnitude of Impacts

- 7.20 Although the construction of house extensions undoubtedly creates many jobs for local trades people and material suppliers, it is not considered that any of the SPD objectives have a significant relationship with sustainability criterion 18.

Geographical Scale of Impacts

- 7.21 The impacts of the proposed SPD will be primarily limited to the Bradford District, however any cumulative positive impacts that arise from the protection of the trees and the natural environment could potentially have positive impacts that extend beyond the boundaries of the District.

Time Period of Impacts

- 7.22 The Householder SPD will be a material consideration once it has been adopted, although it may be afforded some weight prior to that date, after it has been released for public consultation. It is not yet known when the document will be updated, replaced, or cease to be a material planning consideration.

Permanence of Impacts

- 7.23 The impacts of home extensions, alterations and outbuildings are normally permanent, although lightweight structures such as conservatories, porches and pre-fabricated garages may sometimes be considered to have semi-permanent impacts.

Probability of Impacts

- 7.24 If the proposed SPD is implemented, it is certain that it will have immediate impacts on householder planning applications; however the visible impacts of the SPD will become more evident over-time.

Frequency of Impacts

- 7.25 The Council receives thousands of householder planning applications each year, and it is likely that adopting the SPD will influence many of these applications, as such the impacts of adopting the document will be very frequent.

Secondary, Cumulative and/or Synergistic Effects

- 7.26 The visible impacts of the SPD will become more evident over-time as more householder applications are approved and implemented. No secondary or synergistic effects are foreseen.

Uncertainties and Limitations

- 7.27 There is some limited uncertainty regarding the impact of the document upon housing, which are discussed above (refer to paragraph 7.18 – 7.19 for further information). No other significant uncertainties or limitations have been identified or are anticipated.

8.0 ALTERNATIVE OPTIONS

8.1 The Council is required to consider a number of alternative options to determine whether the implementation of the SPD would result in an improvement in sustainability terms on a “business-as-usual” approach. This process enables a comparison between the options, highlighting any potential implications for sustainability. The process also enables recommendations for mitigation of negative impacts/effects of the policy document and any modifications that may be required to the draft SPD.

8.2 During the development of the draft SPD two options were identified. These options need to be appraised using the sustainability objectives as set out in the tables in Section 6.0 of this Report.

- Option 1: Produce the SPD
- Option 2: Business as Usual (No SPD)

Table 9: Option 1 – Produce the SPD

SUSTAINABILTY CRITERIA	
Built environment and land use	✓
Cultural heritage	✓
Open space/recreation	●
Health and safety	✓
Countryside/rural areas	✓
Water	✓?
Air	●
Agriculture, forestry and soil	✓
Biodiversity	✓
Minerals	●
Waste	●
Energy	●
Travel – movement	●
Travel – mode	●
Access	●
Equity and equality	●
Housing	✓
Employment	●

Key
✓ Significant beneficial effect
✓ ? Likely, but unpredictable beneficial impact
● No relationship or significant impact
X ? Likely, but unpredictable negative impact
X Significant negative impact

Table 10: Option 2 – Business as Usual (Let current guidance expire and have no SPD)

SUSTAINABILITY CRITERIA	
Built environment and land use	X
Cultural heritage	X
Open space/recreation	•
Health and safety	X?
Countryside/rural areas	X ?
Water	X?
Air	•
Agriculture, forestry and soil	•
Biodiversity	X ?
Minerals	•
Waste	•
Energy	•
Travel – movement	•
Travel – mode	•
Access	•
Equity and equality	•
Housing	X?
Employment	•

Key	
✓	Significant beneficial effect
✓ ?	Likely, but unpredictable beneficial impact
•	No relationship or significant impact
X ?	Likely, but unpredictable negative impact
X	Significant negative impact

Rational for Selecting Option 1

83. When tested against the Sustainability Appraisal Framework and compared to Option 2, it is clear that Option 1 would benefit the sustainable development of the District. However, in terms of service delivery and customer satisfaction, there further advantages for the Council, including:

- Faster and more consistent decision making
- Higher quality design
- A higher percentage of householder applications which are approved first-time, without delay
- Less demand and need for pre-application discussions

For these reasons Option Two has been selected by the Council.

9.0 MITIGATING ADVERSE EFFECTS AND MAXIMISING BENEFICIAL EFFECTS

Mitigating Adverse Effects

- 9.1 It is not foreseen that adopting the proposed Householder SPD would have any significant negative impacts or likely but unpredictable impacts upon sustainability. However, it has been acknowledged that there are some uncertainties over the potential impact upon housing as discussed in paragraph 7.18 and 7.19.

Maximising Beneficial Impacts

- 9.2 The relevant policies, plans and programmes and the baseline information set out within the Sustainability Appraisal Scoping report, along with the comments of statutory consultees, have informed the writing and development of the proposed Householder SPD from the outset. This has ensured that the key sustainability issues which the District faces have been understood and that thought has been given to the potential for this document to address each of the key issues in order to maximise the positive impacts of the Householder SPD. However, it has also been necessary to think clearly about the scope of the document. For example, the Council carefully considered including guidance on sustainable design and planning for crime prevention, however no such guidance has been included in the draft of the SPD. This is because the Council have already adopted SPDs which specifically deal with these issues. Although there may have been advantages of being able to tailor this guidance specifically for householders, on-balance, the Council has decided not to include such guidance in the interests of brevity and to prevent confusion. Instead, the proposed SPD is cross-referenced to these documents and other SPDs which are likely to be relevant.

10.0 STAGE E: MONITORING THE SIGNIFICANT EFFECTS OF IMPLEMENTING THE SPD

- 10.1 It is not foreseen that the adoption of the Householder SPD will have any significant environmental effects, which require monitoring to ensure compliance with the *Environmental Assessment of Plans and Programmes Regulations 2004* (the SEA Regulations). This conclusion is consistent with Government advice set out in the *Plan Making Manual*, which advises that topic based SPDs are unlikely to have significant environmental effects⁸. As such, the Local Planning Authority does not propose any formal actions to monitor the environmental effects of the Householder SPD once implemented. In the unlikely event that any unforeseen adverse impacts arise the Local Planning Authority will respond in a pragmatic and timely manner.
- 10.2 As the requirement of Sustainability Appraisal has been removed for SPDs by the Planning Act 2008, the Local Planning Authority is no longer required by Planning Law to monitor the wider social and economic effects of the SPD. Nevertheless, the Local Planning Authority is keen to understand the impacts and the effectiveness of the Householder SPD to help inform future revisions of the document and ensure that it is consistent with and supportive of higher level plans, policies and objectives. To enable such an assessment the Council will establish feedback channels and will convene a Working Group of Council Officers to discuss and act upon any key issues which arise, should this be necessary.
- 10.3 The Equalities Impact Assessment of the Householder SPD will be reviewed within a three year time-frame in accordance with the Councils Race Equality Scheme, which was introduced to comply with the Race Relations (amendment) Act 2000 and other equalities legislation.

⁸Plan Making Manual: <http://www.pas.gov.uk/pas/core/page.do?pagelid=469626> (Accessed 10 May 2010)

APPENDIX 1: STATEMENT OF CONSULTATION

Consultation on the Sustainability Appraisal Scoping Report took place for a period of five weeks from 27th May until 1st July 2008. Copies of the document were sent to the 3 statutory bodies and the document was also placed on the Council's website for public viewing and comment.

Comments were received from each of the 3 statutory consultees, these have been taken into consideration in the production of this Sustainability Appraisal Report and are outlined in Appendix 2 of this report.

List of Consultees consulted on the Sustainability Appraisal Scoping Report:-

English Heritage

Environment Agency

Natural England

Natural England - West Yorkshire Team

APPENDIX 2: SUMMARY OF REPRESENTATIONS TO SUSTAINABILITY APPRASIAL SCOPING REPORT FOR LANDSCAPE CHARACTER SUPPLEMENTARY PLANNING DOCUMENT

Consultee (Name/ Organisation)	Representation(s) to Sustainability Scoping Report for Draft Landscape Character SPD	Bradford MDC Response	Outcome
English Heritage	<p>In terms of the historic environment, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the SPD, that it has established an appropriate Baseline against which to assess the SPD's proposals and that it has put forward a suitable set of Objectives and indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which the SPD might have upon the historic environment.</p> <p>English Heritage strongly advises that the conservation staff of the Council and WYAS are closely involved throughout the preparation of the SEA/SA of this SPD.</p>	<p>The SPD has been prepared by the Councils Design and Conservation Team who are very aware of any potential impacts upon the historic environment.</p> <p>Although West Yorkshire Archaeological Service (WYAS) were not consulted on the Scoping Report, they will be formally consulted on the Draft of the SPD and the accompanying Sustainability Appraisal.</p>	<p>None</p> <p>WYAS to be formally consulted on the Draft of the SPD and the accompanying Sustainability Appraisal.</p>

<p>Environment Agency</p>	<p>The Agency agrees that PPS25: Development and Flood Risk is relevant to this SPD. The guidance should make reference to the need to reduce runoff from extensions, outbuildings and hardstandings by referring to sustainable drainage systems (SuDS). The types of SuDS techniques that might be appropriate to house extensions and alterations include permeable paving, green roofs and rainwater reuse.</p> <p>The Agency also agrees that the guidance should include design measures to try and prevent or limit damage from flooding. Buildings should be flood-resilient to reduce the consequence of flooding and improve recovery from it. This can be achieved, for example, through the use of water-resistant materials for floors, walls and fixtures and the siting of electrical controls, cables and appliances at a higher than normal level.</p>	<p>The draft of the SPD has included guidance on the SuDS such as permeable paving. With regard to green roofs and rain water re-use the Councils Sustainable Design Guide SPD already provides guidance on this issue which is applicable to householder proposals.</p> <p>As the Scoping Report highlighted the Council has considered including guidance on issues such as flood resilient design. However, following discussions, specific guidance regarding this issue has not been included in the draft of the SPD. This is because it would only be applicable to a small number of applications. As an alternative, the Council will consider seeking any necessary measures to improve the flood resilience of house extensions on a case-by-case basis.</p>	<p>Guidance included for permeable paving. The draft SPD has also been cross-referenced to the Sustainable Design Guide SPD which has now been included in the list of relevant policies and plans.</p> <p>Although specific guidance will not be included, the desirability of seeking measures to increase the flood resilience of householder proposals will be considered on a case-by-case basis.</p>
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<p>Natural England</p>	<p><u>Section 3: Identification of other relevant policies, plans, programmes and sustainability objectives</u></p> <p>We would advise that Planning Policy Statement 9: Biodiversity and Geological Conservation should be included in the list as because house alterations can have impacts on biodiversity, in particular protected species such as bats and nesting birds. PPS9 also promotes building in biodiversity and geological conservation as part of good design. Section 5 of the companion guide to PPS9, Planning for Biodiversity and Geological Conservation: A guide to good practice gives useful advice on incorporating biodiversity into the fabric of built structures.</p> <p>We have also recently been consulted upon Bradford’s draft Landscape Character SPD and feel that the landscape document will be important in assessing the suitability of many developments, and that this house alterations SPD could usefully ensure that landscape character is taken into account. It should therefore be included in the list of relevant policies and plans.</p>	<p>The Council agree that Planning Policy Statement 9: Biodiversity and Geological Conservation should be included in the list of relevant policies, plans and sustainability objectives. Furthermore, the draft SPD has included guidance in relation to protected species.</p> <p>The Council agree that the Landscape Character SPD should be added to the list of relevant policies, plans and programmes and have cross referenced the draft of the SPD to the adopted Landscape Character SPD.</p>	<p>PPS9 has been added to the up-dated list of relevant policies, plans and programmes. Guidance regarding protected species has been included in the draft SPD. To reflect these changes the objectives of the SPD have also been revised to include reference to bio-diversity, trees and protected species.</p> <p>Landscape Character SPD included in the up-dated list of relevant policies, plans and programmes. The SPD makes reference to the adopted Landscape Character SPD.</p>
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	<p><u>Section 5: Developing the Sustainability Appraisal Framework</u></p> <p>We welcome the sustainability objectives (as listed in the framework table in appendix 1), which cover the key sustainability issues for Bradford. However, we would advise that text making clear the relationship between the sustainability criteria and the sustainability objectives is included to avoid any confusion.</p> <p><u>Appendix 1: Sustainability Appraisal Framework</u></p> <p>We would welcome a key indicator that addresses whether or not house alterations retain or enhance the townscape of an area in addition to safeguarding townscape features.</p> <p>We note from the earlier Landscape Character SPD Consultation that settlement studies will be produced for Bradford City Centre, Shipley, Keighley and Ilkley, which, if they are available during the timeframe of this SPD, may be a useful source of information to inform the SA and SPD if they include assessment of townscape character. Conservation Area Appraisals, where available, may also be useful in this</p>	<p>Accepted. The report uses the Sustainability Appraisal Framework which was used for the RUDP and previous SPDs. When the Sustainability Appraisal Framework is reviewed for the LDF this issue will be assessed.</p> <p>The report uses the Sustainability Appraisal Framework which was used for the RUDP and previous SPDs. In order to retain consistency the Council does not normally amend the framework.</p> <p>The Settlement Study for the Bradford District does not include an assessment of townscape character and although Conservation Area Assessments and Conservation Areas Appraisals do include assessments of townscape character, it is not feasible to provide guidance within the SPD which is tailored to each Conservation Area or the character of every settlement within</p>	<p>None</p> <p>None</p> <p>None</p>
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	<p>regard.</p> <p>We welcome the objective to ‘value and protect the diversity of nature while increasing general wildlife potential’ and note the indicator relating to ‘protected wildlife areas or other rare, vulnerable or locally valued habitats or species’. We agree with the content of the indicator, though we would advise that it should include impacts on Bradford’s ‘three tier’ local sites system, which includes second tier Sites of Ecological and Geological and third tier Bradford Wildlife Areas, as well as wider national (e.g. SSSI sites) and European (SPAs and SACs) designations.</p>	<p>the District. Nevertheless, the document makes clear that Applicants/ Agents should start by carrying out an appraisal of their house and surrounding area and that this information should be taken as the starting point of any design. It should also be noted that many of the Conservation Area Assessments include Development Criteria which although not SPD are material planning considerations and may be relevant to householder proposals.</p> <p>Accepted. The report uses the Sustainability Appraisal Framework which was used for the RUDP and previous SPDs. When the Sustainability Appraisal Framework is reviewed for the LDF this comment will be taken in to account.</p>	<p>None</p>
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