



City of Bradford Metropolitan District Council

# Sustainability Appraisal of the Bradford City Centre Area Action Plan Submission Draft Report

Sustainability Appraisal Non-Technical Summary Report



April 2016

Amec Foster Wheeler Environment  
& Infrastructure UK Limited



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### Report for

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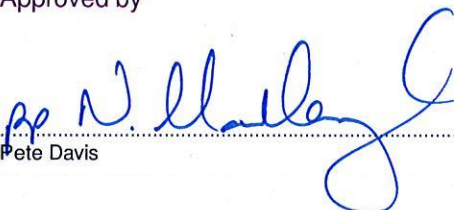
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### Document revisions

No.	Details	Date
1	Draft NTS Report	July 2015
2	Final NTS	October 2015
3	Final NTS for Submission Draft AAP	April 2016



# Non-Technical Summary

## Purpose of this Report

This document is the non-technical summary of the sustainability appraisal of the Bradford City Centre Area Action Plan (BCC AAP) Submission Draft Report. It outlines the sustainability appraisal (SA) process and describes the key sustainability effects anticipated as a result of the different options, policies and sites outlined in the BCC AAP Submission Draft Report. It summarises the findings of the Sustainability Appraisal Report, which will be published to accompany the BCC AAP Submission Draft Report.

### Bradford City Centre Area Action Plan

The City of Bradford Metropolitan District Council is currently in the process of preparing a Local Plan to guide future growth and development in the District (see ([www.bradford.gov.uk/planning](http://www.bradford.gov.uk/planning))). This will replace the existing Replacement Unitary Development Plan for Bradford (RUDP), adopted in October 2005.

The Local Plan for the Bradford District will be made up of a collection of planning documents that will guide future growth and development for housing, employment, leisure and retail for the next 10-20 years. Two Area Action Plans (AAPs) are being produced as part of the Local Plan, one of which is for the Shipley Canal Road Corridor (SCRC) and the other for Bradford City Centre (BCC). These two AAPs will build upon the long term spatial vision for the District set out in the Local Plan Core Strategy and address specific issues within each plan area.

The BCC AAP will provide the statutory basis for implementation of the City Centre Masterplan and the associated four Neighbourhood Development Frameworks (NDFs) for The Bowl, The Channel, The Market and The Valley. The BCC AAP will set out planning policies to guide development proposals in the City Centre, along with details of how these proposals will be delivered.

The development of the BCC AAP Submission Draft Report reflects a considerable amount of work. Public consultation on the BCC AAP Issues and Options Report took place in 2007 and 2008 to identify the key issues facing the City Centre and suggested options for addressing these. This was followed by consultation on a Further Issues and Options Report in July 2013, which took into account the earlier comments received as well as the emerging strategic direction set out in the Local Plan – Core Strategy Further Issues and Options Report. Consultation on the BCC AAP Publication Draft Report took place between December 2015 and February 2016.

The BCC AAP Submission Draft Report:

- ▶ Sets out the broad aims and objectives for sustainable development within the Bradford City Centre AAP for the next 15 years up to 2030;
- ▶ Sets out broad policies for steering and shaping development in the City Centre;
- ▶ Sets out locations for new housing and employment development;
- ▶ Co-ordinates the policies and plans of its partner organisations; and
- ▶ Takes account of national and regional policy and the Council's aims in the '2020 Vision and The Big Plan – the Sustainable Community Strategy'.

The Vision for Bradford City Centre as set out in the AAP Submission Draft Report is that by 2030:

*"Bradford City Centre is now a major destination in the wider region, offering a different experience to other cities. The City is the focal point for leisure, office, retail and apartment development, and has become the place residents and visitors want to live, work and socialise.*

*Redevelopment of the City Centre has seen the sensitive and flexible reuse of historic buildings in Little Germany and Goitside for residential and employment.*

*New build development has incorporated the use of high quality design, which respect the heritage of the city's architecture, and is of the highest viable environmental standards.*

*The City Centre Area Action Plan has helped safeguard and enhance the city's important cultural assets of The Alhambra, St. Georges Hall, The National Media Museum and many more.*

*The City Centre now also benefits from enhanced integrated transport through the delivery of two newly developed railway stations at the Bradford Interchange and Bradford Forster Square, with enhanced pedestrian and cycle routes between these two major public transport hubs. In combination with other enhance public transport routes between Leeds City Centre, Manchester City Centre and the Airports, Bradford City Centre is now more connected and accessible than ever before.*

*The plan has also aided in improving green and blue infrastructure in the City Centre by encouraging the formulation of new open spaces, public realm improvements including extensive tree planting and ecological improvements. The plan has built upon the success of the New City Park and the New Market Place by supporting the delivery of green linear spaces.*

*The AAP has assisted in the delivery of thousands of new jobs by supporting the expansion of new retail, leisure and office premises through land use allocations and a flexible policy approach. Job opportunities for future generations have also been aided by enhancing skills provision through strengthening education facilities within the City Centre.*

*The plan has not created a new City Centre, but has enhanced the existing great qualities and addressed the weaknesses to revitalise the core of the Bradford Metropolitan District."*

The Vision has been informed by work undertaken on the Local Plan: Core Strategy and the Council's Community Strategy.

The Vision for Bradford City Centre will be achieved through 8 strategic objectives and 20 policies contained in 6 thematic chapters, namely:

- ▶ City Living and Community Provision (4 policies);
- ▶ Shopping and Leisure (4 policies);
- ▶ Business (1 policy);
- ▶ Further and Higher Education (1 policy);
- ▶ Movement (6 policies); and
- ▶ Built Form (4 policies).

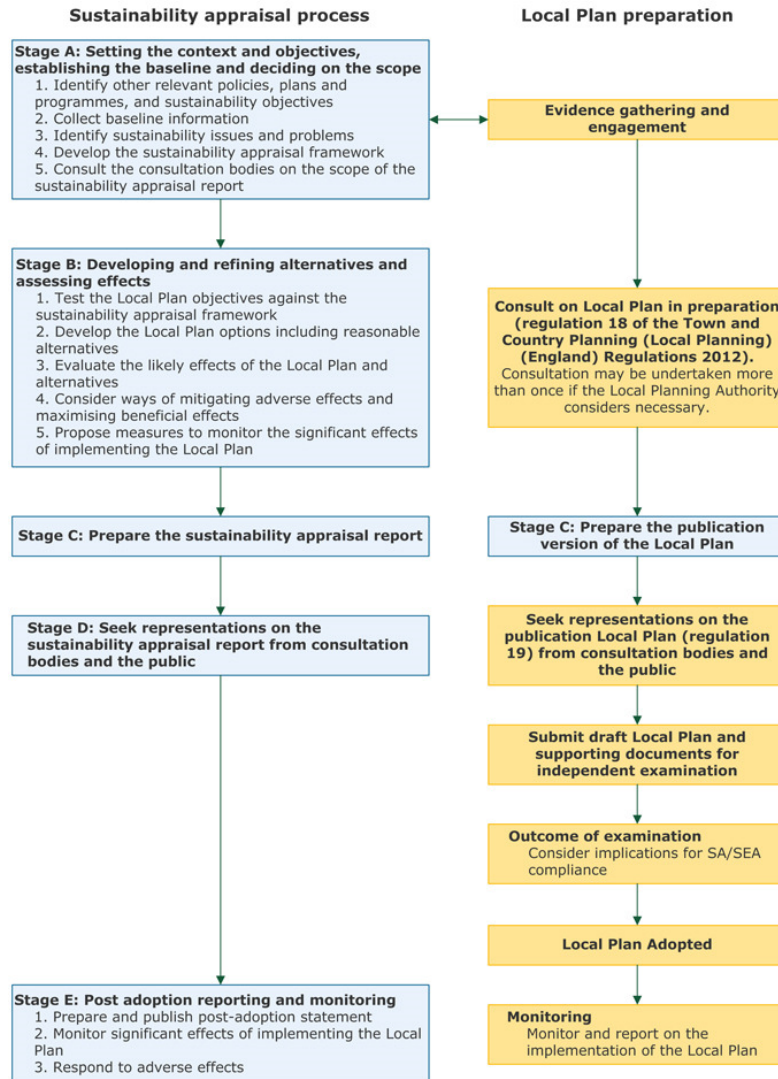
In addition, the AAP also identifies 40 sites which have been assessed as part of this SA.

### Sustainability Appraisal

It is important to ensure that the objectives, policies and sites contained within the BCC AAP Submission Draft Report contribute to the aims of sustainable development. This is commonly defined as ensuring that there is a better quality of life for everyone now and in the future. To this end, the BCC AAP Submission Draft Report has been subjected to a process called sustainability appraisal (SA), the main stages of which are highlighted in **Figure NTS 1**. SA considers the anticipated effects of the BCC AAP on the area's environmental, economic and social conditions. SA of Local Development Documents (including the BCC AAP) is a requirement under Section 19(5) of the Planning and Compulsory Act 2004. In meeting this requirement, local planning authorities must also address the requirements of the European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the Strategic Environmental Assessment (SEA) Directive. This is a law that sets out to integrate environmental considerations into the development of plans and programmes.



Figure NTS 1 Stages in the SA Process



NB: for the purposes of this SA, the BCC AAP Submission Draft Report can be considered to replace the 'Local Plan' referenced to in Figure NTS 1.

**Sustainability Appraisal Undertaken to Date**

The Council undertook an appraisal of the BCC AAP Issues and Options in 2007 and Further Issues and Options in January 2013. Following this, Amec Foster Wheeler were then commissioned to renew and take forward the SA work of the BCC AAP through to adoption, including appraisal of the BCC AAP Publication Draft Report. This work has helped Bradford take forward sustainable policies for the BCC AAP Submission Draft Report.

**Sustainability Appraisal Objectives**

The appraisal of the Vision, Objectives and Policies of the BCC AAP Submission Draft Report has been undertaken considering the likely effects in the short, medium and long term. Each element of the BCC AAP has been scored against each of the 19 SA objectives. The objectives, as set out in **Table NTS 1**, have been developed by the Council following an analysis of the Local Plan Core Strategy SA objectives, examples from other local authorities, links with other relevant plans, policies and programs, and taking account of local circumstances. Table NTS 1 also highlights the relevance of the objectives, if any, to the environmental topics listed in the SEA Directive. The detailed objectives are provided in Section 2.2 of the main SA report.



Table NTS 1 BCC AAP SA Objectives

SA Objectives	SEA Topic Covered
<b>Impacts on the environment and resources</b>	
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	Water, Soil and Air Climatic Factors
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	Water, Soil and Air Climatic Factors
3. Reduce the district's impact on climate change and vulnerability to its effects	Water, Soil and Air Climatic Factors
4. Safeguard and improve air, water and soil resources	Biodiversity, Flora and Fauna, Human Health, Water, Soil and Air
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	Biodiversity, Flora and Fauna
6. Maintain and enhance the character of natural and man-made landscapes	Cultural Heritage and Landscape
7. To protect and enhance historic assets	Cultural Heritage and Landscape
<b>Social Impacts</b>	
8. Provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	Population and Human Health
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	Population and Human Health Climatic Factors
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	Population and Human Health Water, Soil and Air Climatic Factors
11. Improve the quality of the built environment and make efficient use of land and buildings	Population and Human Health Water, Soil and Air Cultural Heritage and Landscape
12. Improve the quality and range of services available within communities and connections to wider networks	Population and Human Health
13. Provide social cohesion, encourage participation and improve the quality of deprived neighbourhoods	Population and Human Health
14. Create good cultural leisure and recreation activities available to all	Population and Human Health Cultural Heritage and Landscape
15. Improve safety and security for people and property	Population and Human Health
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	Population and Human Health
<b>Economic impacts</b>	
17. Promote education and training opportunities which build the skills and capacity of the population	Population and Material Assets
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	Population and Material Assets
19. Support investment and enterprise that respects the character and needs of the local area	Population and Material Assets

In order to appraise the effects of the BCC AAP Submission Draft Report objectives, policies and sites against the SA objectives, the following scoring system has been used:

<b>KEY</b>	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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### Developing the Preferred Spatial Approach

The spatial options have been developed through the various stages of the City Centre AAP. The preferred option is a hybrid of the previous options, which provides policies that will support regeneration in the City Centre as well providing new housing to meet local needs. Central to the approach is the need to maximise the efficient use of land, based on principles for selecting, wherever possible, sites accessible to a range of services and community facilities, and quality public transport services; prioritising allocation of sites that would assist in regeneration or environmental improvement; and avoiding, wherever possible, sites that would cause significant harm to character or setting or key environmental assets.

### Vision, Action Plan Objectives, Policy and Site Appraisal Results

The Vision and Action Plan Objectives were tested for their compatibility with the SA objectives.

The Vision aims to create a City Centre, which is “*now a major destination in the wider region, offering a different experience to other cities. The City is the focal point for leisure, office, retail and apartment development, and has become the place residents and visitors want to live, work and socialise*”. Growth in the City Centre would be supported by the delivery of a significant number of new houses, alongside new business, retail, leisure, cultural, community facilities, and transportation improvements. In consequence, the Vision would have positive impacts on a number of the SA objectives. The Vision will help to ensure that the future development of the City Centre aims to protect and enhance the environment of the BCC, in particular the historical and cultural assets of the City Centre. The Vision will help to ensure that the plan avoids adverse impacts on the important designations and more generally plans positively for the environment of the City Centre. However, the Council’s Vision leaves room for uncertainties, and the potential for negative as well as positive effects has been identified. This includes the conflicts that could arise between growth (economic and visitor growth) and environmental factors (such as the impact on historic environment and climate change). The effects are highly dependent on whether growth is achieved under consideration of economic, social and environmental sustainability.

The compatibility test identified that several of the proposed BCC AAP spatial objectives are compatible with at least one of the SA objectives, and in the majority of cases one or more of the spatial objectives are considered to be highly compatible with at least one of the SA objectives. The compatibility of spatial objectives 1 to 8 with a significant number of the SA objectives is uncertain, as these spatial objectives promote and/or are likely to result in new development which, depending on its design, type and location, could potentially have a positive and/or negative environmental or social impact. None of the spatial objectives have been identified as being incompatible or partially incompatible with any of the SA objectives.

**Table NTS 2** summarises the results of the appraisal by showing anticipated effects of the policies grouped by thematic topic.

Table NTS 2 Summary of AAP Policies Appraisal

SA Objective	Policy Assessments																			
	CL1 - Housing	CL2 - Flood Risk	CL3 - Active Frontages and Community Provision	CL4 - Primary and Secondary Education Provision	SL1 - Retail Development	SL2 - Primary And Secondary Shopping Frontages	SL3 - Improving the Connection Between Shopping Areas	SL4 - Cultural Assets	B1 - Development of Employment Space	ED1 - Promotion of the Learning Quarter	M1 - Walking, Cycling and Public Realm	M2 - Public Transport Services and Infrastructure (Including Taxis)	M3 - Traffic, Highways and Parking	M4 - Impact of New Development Upon the Transport Network	M5 - Biodiversity in the City Centre	M6 - Green / Blue Infrastructure and Open Space within the City Centre	BF1 - The Nature of the Built Form	BF2 - Tall Buildings	BF3 - Built Form and the Environment	BF4 - District Heat Networks
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	0	++	++
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	-	0	0	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	+	+
3. Reduce the district's impact on climate change and vulnerability to its effects.	+	++	0	0	0	0	0	0	0	0	++	++	-	++	+	++	+	0	+/-	+
4. Safeguard and improve air, water and soil resources.	-/?	+/?	0	0	0	0	+/?	0	0/?	0	+/?	+/?	-	0	0	0	0	0	+	0
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats.	+	+	0	0	0	0	0	0	0	0	0	0	+	0	++	++	+	0	0	0
6. Maintain and enhance the character of natural and man-made landscapes.	+	+	+	0	+	+	+	+	+	+	++	+	+	+	++	++	++	++	0	0
7. To protect and enhance historic assets.	+	+	+	0	+/-	?	0	+	+	+/-	+	+/?	+	0	0	+	++	+	0	0
8. Provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	++	++	0	0	0	0	0	0	0	++	0	0	0	0	0	0	+	0	0	0
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts.	0	0	+	0	0	0	+	0	+	+	++	++	++	++	0	+	+	0	0	0
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car.	+	0	+	+	0/?	+/-	+	+	+/-	+/-	++	++	-	++	0	+	+	0	0	0
11. Improve the quality of the built environment and make efficient use of existing land and buildings.	++	+	++	+	++	+	++	++	++	+	+	++	+	+	++	++	++	++	+	0
12. Improve the quality and range of services available within communities and connections to wider networks.	0	0	+	++	++	+	+	++	+	++	++	+	0	+	0	0	+	+	0	+
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods.	+	+	+	++	0	0	+	++	+	+	+	+	+	+	+	+	+	0	0	0
14. Create good cultural, leisure and recreation activities available to all.	++	0	++	+	++	++	+	++	+	++	+	+	+	+	+	+	+	0	0	0
15. Improve safety and security for people and property.	0	+	++	0	0	+	+	0	0	0	+	+	+	+	0	+	+	0	0	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care.	+	+	+	+	0	0	+	0	0	0	+	+	0	0	+	+	0	0	+	0



SA Objective	Policy Assessments																			
	CL1 - Housing	CL2 - Flood Risk	CL3 - Active Frontages and Community Provision	CL4 - Primary and Secondary Education Provision	SL1 - Retail Development	SL2 - Primary And Secondary Shopping Frontages	SL3 - Improving the Connection Between Shopping Areas	SL4 - Cultural Assets	B1 - Development of Employment Space	ED1 - Promotion of the Learning Quarter	M1 - Walking, Cycling and Public Realm	M2 - Public Transport Services and Infrastructure (Including Taxis)	M3 - Traffic, Highways and Parking	M4 - Impact of New Development Upon the Transport Network	M5 - Biodiversity in the City Centre	M6 - Green / Blue Infrastructure and Open Space within the City Centre	BF1 - The Nature of the Built Form	BF2 - Tall Buildings	BF3 - Built Form and the Environment	BF4 - District Heat Networks
17. Promote education and training opportunities which build the skills and capacity of the population.	+	+	0	++	0	0	0	0	+	++	0	0	0	0	0	0	0	0	0	0
18. Increase the number of high quality job opportunities suited to the needs of the local workforce.	0	0	0	+/?	+	0/?	0	+	++	++	0	0	0	0	0	0	0	+	0	0
19. Support investment and enterprise that respects the character and needs of the local area.	+	+	+	0	++	+	+	++	++	++	+	+	+	0	0	0	+	0	0	0

The BCC AAP Submission Draft Report policies will mainly have positive and significant positive effects. In particular there will be significant positive effects in relation to the following objectives:

- ▶ Ensuring the prudent and efficient use of energy and natural resources and the promotion of renewable energy;
- ▶ Reducing the district's impact on climate change and vulnerability to its effects;
- ▶ Maintaining and enhancing the character of natural and man-made landscapes;
- ▶ Providing the opportunity for everyone to live in quality housing which reflects individual's needs, preferences and resources;
- ▶ Developing and maintaining an integrated and efficient transport network which maximizes access whilst minimising detrimental impacts;
- ▶ Improving the quality of the built environment and make efficient use of existing land and buildings;
- ▶ Improving the quality and range of services available within communities and connections to wider networks;
- ▶ Promoting education and training opportunities which build the skills and capacity of the population; and
- ▶ Supporting investment and enterprise that respects the local character and needs of Bradford and the wider area.

A couple of minor negative effects are identified. One relates to waste streams and the second concerns Policy M3, which focuses on highway improvements that could impact on climate change and local air quality. Cumulatively, it is anticipated that the BCC AAP Submission Draft Report policies will have strong positive effects on a number of the SA objectives. Any negative effects, or uncertainties, can be mitigated mainly through cross-referencing to other policies of the AAP and Core Strategy.

### Sites

There are a number of key development sites allocated for development in each of the six neighbourhoods which make up the City Centre in Bradford. These sites have been allocated for different uses depending upon which neighbourhood they are in and what type of development is proposed for that neighbourhood.

There could be some significant benefits from the site allocations. The sites are: already located close to sustainable modes of transport; they could deliver new community, leisure, employment, education and retail facilities; and are all on brownfield land, with the majority currently vacant or demolished. A significant amount of housing, which is required by the Core Strategy, could be delivered in a location which is highly sustainable in relation to key services and could deliver other infrastructure benefits.

Cumulatively there are a number of potentially significant effects, including on flood risk, the historic environment, open space, and on highways. It is anticipated however, that the likely significant effects on these SA objectives could be mitigated through the application of other policies in the AAP (and within the Core Strategy) and at the individual planning application stage, when detailed design and mitigation measures will also be considered (such as site layout, design and access and the incorporation of ecological enhancement measures and Sustainable Drainage Systems (SuDS)). Furthermore, specific enhancements for individual sites are set out within the Proposal Statements for each site allocation that demonstrate how the likely significant effects that have been identified for each site could, in some instances, not only be mitigated but could be minimised with proposals designed to make a positive contribution towards sustainable development.

Cumulatively, there will be a mixed positive and negative impacts from the site allocations, and the adverse effects of development proposals can be mitigated with appropriate measures in line with planning policies. After the application of the mitigation and enhancement measures, none of the effects identified are considered to be significant.

## Mitigation

Whilst the BCC AAP Submission Draft Report has largely significant positive impacts against the SA objectives, there are a number of areas where the current policies could be revised and amended to produce an improved performance against the sustainability appraisal objectives (or to improve clarity) to aid implementation. These are summarised in **Table NTS 3**.

**Table NTS 3 Suggested Mitigation Measures and Policy Wording Amendments**

Policy	Suggested Mitigation
Policies	Cross referencing with other policies of the AAP and Core Strategy.
Sites	It is anticipated that the potential adverse effects on the SA objectives due to flood risk, effects on the historic environment, and effects on the road network could be mitigated through the application of other policies in the AAP and the Core Strategy as well as at the individual planning application stage, when detailed design and mitigation measures will also be considered.

Further details of proposed mitigation measures can be found in the main SA report. The main SA report also contains a list of provisional monitoring measures to enable the effects of the City Centre Area Action Plan to be identified and assessed.

## Compliance with National Planning Policy Framework

It should also be noted that the BCC AAP Submission Draft Report is in general accordance with the National Planning Policy Framework (NPPF) in that it will deliver at a local level many of the aims and objectives of the NPPF, particularly in relation to the following aspects:

- ▶ Building a strong and competitive economy;
- ▶ Ensuring the vitality of town centres;
- ▶ Promoting sustainable transport;
- ▶ Delivering a wide choice of high quality homes;
- ▶ Requiring good design;
- ▶ Promoting healthy communities;
- ▶ Protecting green belt land (notwithstanding planned local green belt reviews in the plan);
- ▶ Meeting the challenge of climate change;
- ▶ Conserving and enhancing the natural and historic environments; and
- ▶ Facilitating the sustainable use of minerals.

## Next Steps

The BCC AAP Submission Draft Report will be submitted to Government and then be considered by an independent Inspector at a public examination. The Inspector's role is to consider whether the plan can be considered to be sound having regard to a number of factors including the plans compliance with national planning policy. The Examination process may result in a judgement that the plan would be sound, subject to a number of modifications being made. If modifications are necessary these would be published by the Council before adopting the AAP through a meeting of the Full Council.

