

**Bradford Local Plan**

**Core Strategy Examination Session Day Ten**

**Matter 7D: Environment**

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

**Venue: Victoria Hall, Saltaire**

## **Issue 7.16**

### **Policy EN1 – Protection and Improvements in provision of Open Space and Recreation Facilities**

- a. **Is the approach to protecting and improving open space and recreational facilities fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- b. **Are the Open Space Standards (Appendix 9) unduly onerous, prescriptive and inflexible, and do they take viability issues into account? Is the evidence appropriate, up-to-date and accurate, and is there sufficient evidence to justify the approach to Green Infrastructure, Local Greenspace, Built Recreation Facilities and Standards of Provision and Maintenance?**

### **Response**

- 1.1 The policy seeks broadly to protect existing provision of open space and recreation facilities and to achieve improvements in green infrastructure needed to support population growth. It is underpinned by the Health Impact Assessment (SD012), health related data, sustainability appraisal work (SD002), the Bradford Open Space Sport and Recreation Study (EB047) and more recent work in relation to a number of constituent elements in the study eg the playing pitch strategy.
- 1.2 The Bradford Open Space, Sport and Recreation Study was produced by Knight Kavanagh and Page on behalf of Bradford Council. The assessment sets out the results of research and analysis of open space, sport and recreational facilities provision within Bradford and addresses the quantity, quality and accessibility of provision. The assessment identifies whether provision is adequate or whether there are gaps in provision and deficiencies in the quality of existing areas of open space.
- 1.3 This work was carried out on the basis of the approach and typologies identified in former guidance PPG17. However it is considered that the definition of open space in the Appendix to the NPPF, which provides support for 'all open space of public value' and areas that 'can act as a visual amenity' provides a sufficiently broad definition to encompass the majority of these typologies and the elements identified in part A of policy EN1.
- 1.4 The Open Space Sport and Recreation Study identified standards for provision of a range of different types of open space. However it did not identify standards for certain types of less formal provision e.g. semi-natural green space. Natural England's Accessible Natural Green Space Standards (ANGst) are also health related and based on the premise that everyone should have access to natural green space near to where they live. These standards, which formed the basis for

work undertaken by Natural England on a region wide basis, may be used to address this issue.

- 1.5 The NPPF supports the retention of existing open space and sports and recreational buildings and land. It also supports the principle of a local population having access to high quality open spaces and opportunities for sport and recreation as making an important contribution to the health and well-being of sustainable communities.
- 1.6 National guidance indicates that open space which includes all open space of public value can take many forms. Open space is supported for the health and recreation benefits it can provide, ecological value and contribution to green infrastructure, as well as being an important part of the landscape and setting of built development and an important component in the achievement of sustainable development. The guidance indicates that it is the role of local planning authorities to assess the need for open space and opportunities for new provision in their areas.
- 1.7 In common with many other core strategies, the wording of EN1 identifies principles rather than prescriptive standards. This is due to the strategic nature of the plan and the need to update the overall assessment informed by a range of standards as work commences on the Allocations DPD. The standards identified in Appendix 9 are provided for background information purposes and as an indicator of standards identified by a number of external bodies.
- 1.8 The approach to standards of provision and maintenance identifies broad parameters for the future development of standards. The evidence base overall is considered to be sufficiently up to date and accurate to inform a core policy and to be proportionate to the needs of a strategic plan. It is considered that the principles set out incorporate sufficient flexibility for viability to be taken into account through assessment on a site by site basis.
- 1.9 With support from Sport England, the Council engaged consultants to assess the sports and leisure infrastructure in the district. The Sports and Recreation Facilities Assessment focused on provision of swimming pools, sports halls and fitness facilities and assessed whether the supply of built facilities was meeting demand.
- 1.10 Work has also been taken forward on a playing pitch strategy and in relation to an allotments strategy. Individual strategies will feed into wider work on assessment of open space and outdoor sports facilities, linked to progress and decision making in relation to the Allocation DPD, Area Action Plans and neighbourhood planning.
- 1.11 The Open Space, Sport and Recreation Study assessed the adequacy of the provision for a range of open space and recreation facilities at the time of the study. The growth that needs to be accommodated and

changes in definitions of open space mean that a review of provision will be necessary linked to locations identified to accommodate growth. Consultation with local communities will take place in relation to local green space, through the preparation of Local Plan Documents and Neighbourhood Plans.

- 1.12 Work on identifying existing open spaces and the application of ANGst standards has been used in planning for green infrastructure at a regional level. This work needs to be taken forward in the district context, linked to work on Habitats Regulation Assessment (HRA) (SD022) which supported the need for green space of a quality, accessibility and nature to divert visitors from protected moorland.

#### **Issue 7.17**

##### **Policy EN2 - Biodiversity and Geodiversity**

- c. **Is the approach to protecting Biodiversity and Geodiversity, including North/South Pennine Moors, Locally Designated Sites, Habitats and Species outside Designated Sites and Enhancement to biodiversity fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

#### **Response**

- 2.1 The approach is justified by evidence relating to the identification and description of European, national and locally designated sites, the mapping of key ecological networks of grassland, woodland, wetland and heathland, records of woodland, work on the local biodiversity action plans and on UK and local BAP habitats and work carried out to support HRA. Evidence base sources and the wealth of habitats and wildlife within the district are described in further detail in the core strategy paragraphs 5.4.34 and 5.4.60.
- 2.2 The policy approach was supported and informed by stakeholders and wider groups through the consultation process and through the sustainability appraisal.
- 2.3 The policy will be delivered through a wide variety of measures, programmes and working with a range of key partner organisations; including West Yorkshire Ecology, other local authorities, local nature partnerships, local wildlife groups and the Forest of Bradford. For example, regional work with the Environment Agency and other strategic partnerships has achieved success, through using development opportunities alongside the Rivers Aire and Wharfe to support work that introduces fish passes and removes high weirs in order to encourage salmon to return.
- 2.4 Joint working with other local authorities, through fora such as Pennine Prospects, West Yorkshire Ecology, West Yorkshire Biodiversity Action Plan Partnership (WYBAP) and WYBAP Strategic Waterways Group

will inform requirements and maximise the resources available to achieve enhancement of the biodiversity resource and start to reverse biodiversity decline. Ecological networks and biodiversity enhancement opportunities will be integrated into plan-making as part of the wider Green Infrastructure approach for the District and should be designed into proposals for development at an early stage.

- 2.5 Work will be taken forward on local Biodiversity Action Plans and priority habitats, in liaison with local stakeholder groups, benefiting from the knowledge, enthusiasm and resources of the third sector. The policy will be implemented through the choice of potential locations for development and the identification of requirements for habitat creation, enhancement and management in association with the development of proposals.
- 2.6 More specific requirements will be identified in Local Plan Documents and may be included in Neighbourhood Plans. Deliverability will be linked to a range of other policies in the plan including green infrastructure (SC6) and landscape (EN4). It will be supported by future work linked to Habitats Regulations Assessment and the production of an Special Protection Area (SPA) to guide implementation of policy SC8 relating to the South Pennine Moors zone of influence.
- 2.7 Positive support for biodiversity is a strong theme running through the NPPF and guidance. Local planning authorities should aim to conserve and enhance biodiversity, minimise impacts on biodiversity and contribute to the government's commitment to halt the overall decline in biodiversity. The overall approach supports taking forward a number of principles noted in the guidance relating to the protection and enhancement of biodiversity. The principles are that work should be led by an understanding of ecological networks and should include habitat restoration, re-creation and expansion, support for the buffering of existing important sites and securing management for long term enhancement.
- 2.8 Policy EN2 supports the approach to the hierarchy of sites identified in the NPPF. This is also reflected in the overall approach to biodiversity in guidance which, as a first step seeks to pose the question of whether harm to wildlife species and habitats can be avoided by locating on an alternative site with less harmful impacts.
- 2.9 The policy is considered to contribute to the wider aims of national policy and guidance by contributing towards the aim of allocating land with the least environmental or amenity value and safeguarding and enhancing the provision of natural greenspace as part of a wider approach to green infrastructure.
- 2.10 The policy also supports the Councils duty under section 40 of the Natural Environment and Rural Communities Act 2006 to conserve and

enhance priority habitats and to have regard to the purpose of conserving biodiversity when exercising its functions.

#### **Issue 7.18**

#### **Policy EN3 – Historic Environment**

- d. **Is the approach to preserving, protecting and enhancing the character, appearance, archaeological and historic value and significance of the District's designated and undesignated heritage assets and their settings fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

#### **Response**

- 3.1 Policy EN3 is supported by extensive evidence on the historic environment. In particular:
- Settlement Studies (EB040 – EB43)
  - Baseline Analysis Study (EB038)
  - Saltaire World Heritage Site Management Plan (PS/B001b xxxiv)
  - Conservation Area Assessments & Management Plans (PS/B001b xxxiii)
- 3.2 Further work has been undertaken in consultation with English Heritage with regard to the registered battlefield of Adwalton Moor. The Council has produced a report setting out the key considerations of the designated asset in respect of the Core Strategy.
- 3.3 The Policy is justified with reference to the evidence setting out the significant scale and importance of the Districts heritage assets. The policy in relation to these assets is in conformity with NPPF in particular policy set out in section 12.
- 3.4 Several minor modification are proposed to the policy and supporting text as well as related minor modifications to the sub areas in relation to heritage assets in response to representation by English Heritage.
- 3.5 In response to the representation by English Heritage seeking clarification as to the policy for scheduled ancient monuments and archaeology if the Inspector considers this aspect to be unsound and the plan requires a main modification to provide a clearer approach on this matter, the council consider a version of the wording proposed by EH to be appropriate.

## Issue 7.19

### Policy EN4 – Landscape

- e. **Is the approach to conserving, managing and enhancing the diversity of landscapes within the District, including the criteria set out, fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

### Response

- 4.1 The work produced by Natural England, in consultation with a wide range of stakeholder groups, on Natural Character Area Profiles provides detailed descriptions of character and important issues and analyses landscape change and opportunities for enhancement. The 3 Natural Character Areas within Bradford District are; the Southern Pennines, the Yorkshire Southern Pennine Fringe and the Nottinghamshire, Derbyshire and Yorkshire Coalfield.
- 4.2 Within the context of the work carried out by Natural England, a detailed landscape character assessment of the District has been carried out, subject to consultation and published in the adopted Landscape Character SPD (PS/B001b xxi). The appraisal identifies ten specific, distinct and unique landscape character areas, and sets out a description of each area. Important positive features and detractors are identified and an analysis provided of the areas sensitivity to change.
- 4.3 The character of the Districts' landscapes is very varied, ranging from the rugged open moorland of the South Pennine uplands to rolling farmland, and open river valleys to wooded hillsides. The diversity of landscape character areas, form an important element in Bradford's identity and the quality of life of its residents. The landscape backdrop is a significant influence on the character of individual settlements. Identified landscape character is therefore considered to be a key component of local distinctiveness that helps to create a 'sense of place'.
- 4.4 Policy EN4 seeks to ensure that proposals for development and other projects, that could have an impact on the landscapes within the district, particularly, but not exclusively, those on the edge of settlements, contribute towards the management and enhancement of the districts' landscapes and biodiversity and heritage resources.
- 4.5 Landscape character assessment allows proposals to be addressed in relation to the key characteristics, sensitivities and special qualities of a local landscape typology. One of the distinctive qualities that landscapes of the South Pennines in Bradford District have are the locations, settlements, features and viewpoints that have cultural associations with the writings of the Brontes, who lived in Haworth. Rombalds Moor, settled since prehistoric times, and rich in remains (including numerous scheduled ancient monuments of carved rocks,

burial mounds and stone circles) and the distinctive cow and calf rocks is also of significant value.

- 4.6 The development of policy EN4 has been strongly supported by a range of stakeholder groups and through the sustainability appraisal process.
- 4.7 Landscape and visual impact assessment (either as part of an Environmental Impact Assessment or as an 'appraisal' of proposed development) provides a means of assessing the potential landscape and visual effects of proposals. The District's Landscape Character Assessment will be used to inform and appraise individual proposals.
- 4.8 Landscape character assessment and visualisation techniques provide a means of assessing the potential impact of proposals, provided they are used to influence decision making in relation to siting and design considerations, both for small-scale projects, which can have a cumulative impact, and in relation to identifying locations for more significant development. The Design Section, and particularly Policy DS2 Working with the Landscape, will also contribute towards the implementation of this policy.
- 4.9 Identifying green infrastructure and ecological networks can also be seen as complementary processes, as the mapping of key strategic assets is likely to overlap. Delivery of projects to enhance the local landscape will take place in association with a range of agencies; including the Forest of Bradford, local nature partnerships. Projects associated with the Leeds City Region Green Infrastructure Strategy could have the potential to enhance local landscapes.
- 4.10 The NPPF supports the setting out of criteria based policies against which proposals for development affecting landscape will be judged and which give appropriate weight to the contribution made to wider ecological networks. Protecting and enhancing valued landscapes, geological conservation interests and soils is one of the means identified through which planning should make a contribution towards conserving and enhancing the natural environment.
- 4.11 When preparing plans to meet development needs, the aim should be to minimise adverse effects on the local and natural environment. The NPPF makes it clear that plans should seek to allocate land with the least environmental or amenity value. Policy EN4 supports the retention and enhancement of local distinctiveness and character and valued landscapes.
- 4.12 More recent national guidance indicates that one of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape,



including not only designated landscapes but also the wider countryside.

- 4.13 Where appropriate, landscape character assessments should be prepared to complement Natural England's National Character Area profiles. Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood planning.

## **Issue 7.20**

### **Policy EN5 – Trees and Woodland**

- f. **Is the approach to preserving and enhancing the contribution that trees and areas of woodland make to the character of the District fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

### **Response**

- 5.1 The approach is underpinned by information relating to Tree Preservation Orders, the mapping of the Council owned woodland resource, information on local biodiversity sites and ecological network mapping of the woodland resource. It is based on the multiple functions that woodland provide and the range of benefits that it offers for both wildlife and people.
- 5.2 Woodland and trees are key elements of a sustainable environment. The approach is supported by the sustainability appraisal and in the responses to consultation, giving an indication that trees are a locally valued landscape and resource.
- 5.3 They enhance both urban and rural landscapes, provide valuable habitats for wildlife, create opportunities for leisure and recreation and combat pollution by providing oxygen and absorbing dust and carbon dioxide. Trees can also help reduce heat loss from buildings and contribute to energy conservation objectives by providing shelter, minimising the effects of driving rain and reducing exposure.
- 5.4 The purpose of the policy is to preserve and enhance the contribution that trees and woodland cover makes to the character of the district and to ensure that this is taken into account in relation to the identification of land for future development through the Local Plan and in the appraisal of individual proposals for development.
- 5.5 Trees and woodland merit special attention as the district has a relatively low level of woodland cover, because woodland habitats take time to evolve and become established and due to the fact that trees provide such a wide range of services for both the districts residents and for

wildlife. Less than 5% of Bradford is woodland compared to a national average of 10%.

- 5.6 The Woodland Strategy expresses the Council's commitment to improving the amount of woodland cover and quality of woodlands in Bradford. All landowners need to be encouraged to improve the upkeep and management of woodlands and trees to ensure that these valuable assets continue to benefit future generations. The identification of future locations for development needs to make a positive contribution towards enhancing woodland cover. Where existing woodlands or new planting are important to the successful integration of new development into the landscape, long term management plans will be required.
- 5.7 The Forest of Bradford has increased woodland/tree cover throughout the district in partnership with local communities, 220 hectares new woodland (500,000 trees) and 12km new hedgerows since 1997 and continues to make progress.
- 5.8 Tree Preservation Orders will be actively used to sustain the landscape character of the district and to influence the layout of new development. They offer a means of seeking to ensure that mature and healthy trees are retained where development occurs, providing visual amenity for future residents and the wider community.
- 5.9 Delivery of policy EN5 will also be linked to implementation of policies relating to biodiversity, green infrastructure and landscape.

#### **Issue 7.21**

##### **Policy EN6 – Energy**

- g. **Is the approach to maximising improvements to energy efficiency and support the development of renewable and low-carbon sources of energy, including identifying strategic low carbon and renewable energy opportunities, locational criteria and setting out local requirements for the use of decentralised energy and sustainability of buildings, fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- h. **Should the policy set targets for renewable and low-carbon energy?**
- i. **Is the policy unduly onerous and inflexible, and has it properly taken account of viability and practical issues in terms of renewable and low carbon energy provision?**

#### **Response**

- 6.1 The purpose of policy EN6 is to encourage the provision of renewable and low carbon energy through the planning system, but also to recognise the role of planning in setting the framework to allow

assessment of potential impacts and to influence decision-making based on assessment.

- 6.2 In relation to setting out policies to encourage the provision of renewable and low carbon energy, one of the key issues is to positively identify local requirements, in a manner that allows bespoke design solutions to be identified that take account of feasibility and viability. The policy also identifies the need to assess a full range of environmental, economic and social impacts of proposals.
- 6.3 A study, commissioned by Local Government Yorkshire and Humber to assess the resource for low carbon and renewable energy generation across the Yorkshire and Humber region, was published in 2011. The study identifies a range of opportunities within the District, including potential for wind energy and hydro generation. Many areas of Bradford have the density necessary to support district heating networks and there are public buildings that could provide anchor loads for such networks.
- 6.4 The findings of the latest regional study provides an evidence base to assist local authorities in developing a strategic approach to renewable and low carbon energy. The study recognised that further work needed to be done at a district level to provide more detailed interpretation. It is considered that this work provides an evidence base that is proportionate for a strategic level of policy making. It is recognised that further work is necessary to investigate in more detail the technologies that constitute the districts renewable energy potential could most usefully be carried out to support future work linked to allocations. This work would investigate the potential for larger scale low carbon schemes to serve new development and existing communities. This would make use of information giving a broad indication of viability provided to support the core strategy.
- 6.5 For new development the main driver for increasing the contribution from micro-generation technologies is likely to be the progressive tightening of the Building Regulations, up to and including the introduction of a zero carbon requirement for homes and other buildings and the delivery of allowable solutions. Recognising the potential for local authorities to assist in delivery of renewable and low carbon energy, the Council is committed to facilitating community led renewable energy generation projects and maximising the potential for delivery within the Leeds City Region.
- 6.6 The role of targets in relation to the promotion of renewable and low carbon sources will be given further consideration once further work on the interpretation of strategic potential has been carried out. Work will need to be taken forward to identify the range of potential technologies, impacts, locations for development and viability. The recent guidance indicates that 'whilst local authorities should design their policies to

maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver’.

- 6.7 Policy EN6 is a strategic policy which identifies broad principles and directions of travel. It is not therefore considered to be unduly onerous or inflexible. Viability is identified as a potential issue. In identifying broad parameters the policy has sufficient flexibility to allow viability to be assessed through future plan-making and on a site by site basis.

## **Issue 7.22**

### **Policy EN7 – Flood Risk**

- j. **Is the approach to flood risk, including the criteria and requirements set out in the policy fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)? Are there any outstanding issues raised by the Environment Agency and other relevant bodies or organisations?**

### **Response**

- 7.1 The Strategic Flood Risk Assessment (SFRA) provides data and guidance to inform the flood risk policies in the Core Strategy. Bradford’s Level 1 SFRA document (EB048) has been prepared by JBA Consulting. The SFRA identifies the functional flood plain (Flood Zone 3b), comprising largely of open and undeveloped land where water has to flow or be stored in times of flooding.
- 7.2 Policy EN7 identifies principles to guide the process of identifying locations for future development while seeking to reduce flood risk, assess proposals that come forward and adopt a positive approach to water management. The most important principle, in terms of managing risk is that development should only be permitted in areas of high flood risk when there is no reasonably available land in areas of lower flood risk and the overall benefits of the development outweigh the risks from flooding.
- 7.3 The SFRA provides a framework for the overall appraisal and management of risk. It allows the identification of land with the lowest probability of flooding that would be appropriate to the type of development or land use proposed. Information from the SFRA and Sustainability Appraisal has been used to demonstrate the principle of sequential testing at a strategic level. A draft sequential testing paper has been produced which provides further detail about how this work has been carried out.
- 7.4 The flood risk and water management policy will be implemented using the framework set out in the SFRA Level 1 which provides further guidance for planners and developers. In relation to individual planning applications, a flood risk assessment may be required for sites and should be proportionate to the risk and appropriate to the scale, nature and locations of the development taking into account flooding from all

sources. Site specific flood risk assessments will be assessed by the Council's drainage team and the Environment Agency.

- 7.5 Where major development is proposed in an area vulnerable to surface water flooding, an assessment of the impact of proposals on drainage systems will need to be integrated into the planning process. The principle of using sustainable urban drainage to reduce the impact of new development in urban areas within the district is supported in the policy. Work has started on producing development control standards for drainage design and surface water treatment.
- 7.6 The approach to flood risk has strong links with principles of green infrastructure, set out in Policy SC6 and the value for amenity and wildlife of creating space for water.
- 7.7 The NPPF supports the sequential testing approach and identifies principles in relation to how this should be carried out through the plan-making process. This approach has been followed in the draft sequential testing paper produced.
- 7.8 All forms of flooding and their impact on the natural and built environment are planning considerations. The overall objectives are those of appraising, reducing and managing all sources of flooding. Key principles identified are; safeguarding land from development that is required for current and future flood management, using opportunities offered by new development to reduce the causes and impacts of flooding and developing policies to manage flood risk from all sources. Policy EN7 identifies a range of principles that need to be applied to achieve flood risk objectives and apply key principles at a district level.
- 7.9 A draft sequential testing paper has been produced and agreement reached in relation to minor updating of the SFRA Level 1 and a minor modification about text relating to the Airedale Trunk Sewer is being proposed by the Council to provide clarification.

### **Issue 7.23**

#### **Policy EN8 – Environmental Protection**

- k. **Is the approach to environmental protection, including the criteria and requirements set out in the policy relating to air quality, land, nuisance, and water environment, fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- l. **Does the policy properly consider amenity issues, is it unduly onerous and inflexible, and has it properly taken account of viability issues?**

## **Response**

- 8.1** Bringing forward brownfield land for housing development, particularly where this lies within densely developed transport corridors, and takes place on land formerly used for industrial activity raises issues relating to land, air and water quality which can have a significant impact on quality of life, community cohesion, health and amenity.
- 8.2** The legacy of past manufacturing, engineering and industrial processes, which still continue in many areas to provide a valuable source of employment, has resulted in the potential for residual contamination of sites across the district. Bradford has a number of sites where significant quantities of potentially hazardous chemicals are used and stored. These chemical plants are a major source of local employment but the storage and use of these chemicals can place restrictions on development in the surrounding area and involve the need for risk assessment. Nuisance issues, for example noise, dust, odour and lighting can have a significant impact on quality of life, health and amenity.
- 8.3** Contaminated land is often a significant issue where sites proposed for residential use were formerly occupied by manufacturing activities or other industrial processes. To successfully resolve issues relating to residual contamination, sites must be subject to appropriate investigation and assessment of potential risks associated with previous land uses to make them 'suitable for use'.
- 8.4** Bradford Council has produced a District Air Quality Strategy, which was adopted in April 2011. The Strategy aims to take a proactive approach to help maintain and improve air quality within the District. A district-wide approach is needed due to the fact that air quality in Bradford is worse than in many other parts of the UK. Air quality problems in the district are mainly attributable to transport, in order to mitigate against this Bradford Council adopted a Low Emission Strategy in November 2013.
- 8.5** Addressing air quality issues is recognised to be complementary to the aim of achieving a reduction in transport emissions, reflected in the transport theme and which forms an important element in the District's overall approach to climate change. It is also recognised that the impact of transport is a cross boundary issue and Bradford Council are working with the four other West Yorkshire Local Authorities to develop a West Yorkshire Low Emission Strategy which will (amongst other measures) provide consistent air quality and development control policy across West Yorkshire.
- 8.6** In certain residential areas in Bradford the annual mean objective for nitrogen dioxide is almost double the national health based standard. As a result in 2006 Bradford designated four Air Quality Management Areas. Poor air quality is linked to respiratory illness, heart disease and asthma and is therefore a significant Public Health issue in Bradford.

- 8.7** The Low Emissions Strategy identifies planning and development control measures that are capable of mitigating and improving vehicle emissions and exposure to emissions, enabling residents to make green vehicle choices. The development control measures, which are in the process of being implemented, introduce air quality mitigation as part of a good scheme design, addressing the issue of cumulative impact and provide clarity and consistency for evaluation of proposals.
- 8.8** The European Water Framework Directive came into force in 2000. The main environmental aims are prevention of the deterioration of aquatic water systems and the restoration of polluted surface water and groundwaters to a 'good status'. The River Basin Management Plan for the Humber addresses at a strategic level, the integrated management of the water environment. The policy relating to water quality expresses the Council's commitment to working with partners to achieve the aims of the water directive framework.
- 8.9** Policy EN8 has been written within the parameters set by the NPPF, National Planning Practice Guidance and the relevant pollution control and risk assessment regimes. The approach has been supported in the sustainability appraisal.
- 8.10** The issues identified in the policy are important in ensuring the health, safety and quality of life of those who currently live and work within the district and will do so in the future. In the context of the need to identify land to accommodate growth within the district, it is essential that parameters are also set to achieve mitigation and management of impacts and to ensure that locations identified for development take into account existing or potential sources of pollution.
- 8.11** Contaminated land is often a significant issue where sites proposed for residential use were formerly occupied by manufacturing activities or other industrial processes. To successfully resolve issues relating to residual contamination, sites must be subject to appropriate investigation and assessment of potential risks associated with previous land uses to make them 'suitable for use'.
- 8.12** The policy is not considered to be unduly onerous or inflexible and should allow viability to be taken into account in circumstances where this would not compromise public health standards.
- 8.13** Detailed guidance has been adopted in relation to the Low Emissions Strategy. The guidance has the following key elements:
- It provides a systematic way in which developments of all types can be assessed in terms of air quality impact.
  - It categorises developments into minor, medium and major and proposes mitigation that is proportionate to the scale and kind of development.

- It uses a well-established HMRC damage-cost calculation tool to determine the level of investment required to make the development sustainable in air quality terms.
- It takes account of the incremental impact on air quality that even small developments can have on air quality and seeks to address this in a proportionate and practical way (in line with DCLG guidance on cumulative impact).
- It focuses on realistic, practical and achievable measures to protect and improve air quality.
- It seeks to minimise further exposure to poor air quality by sensitive receptors

8.14 The approach taken provides clarity and certainty to developers and planners so that it is easy to understand how air quality will be considered during the planning application process. The approach also emphasises to developers how they should consider appropriate mitigation at the design stage so that mitigation becomes an integral part of the development and not an after-thought.

8.15 Policies relating to nuisance and land contamination are broadly based to enable flexibility and ensure that site specific situations can be taken into consideration.