



City of Bradford Metropolitan District Council

Sustainability Appraisal of the Bradford Core Strategy

Addendum to the Sustainability Appraisal Report of the Bradford Core Strategy Publication Draft: Appraisal of Post Examination Hearing Core Strategy Changes



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Document revisions

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B	Final Report	24/11/15



Executive Summary

Introduction

This Non-Technical Summary (NTS) provides an overview of the addendum to the Bradford Core Strategy Publication Draft: Sustainability Appraisal Report. The addendum presents the findings of the Sustainability Appraisal (SA) of the proposed main modifications to the Council's Core Strategy¹ (which is in effect the Council's new Local Plan) and which comprises the amended policies by the City of Bradford Metropolitan District Council (CBMDC) following submission of the Publication Draft Core Strategy to the Planning Inspectorate on the 12th of December 2014.

The following sections of this NTS:

- ▶ Provide an overview of the Bradford Core Strategy including the Proposed Policy Changes;
- ▶ Describe the approach to undertaking the SA of the Proposed Policy Changes;
- ▶ Summarise the findings of the SA of the Proposed Policy Changes; and
- ▶ Sets out the next steps in the SA of the Core Strategy.

What is the Draft Core Strategy?

The Draft Core Strategy sets out the Council's vision for Bradford District out to 2030 and provides the spatial planning response to the challenge of growth. It has been developed taking into account national planning policy and guidance, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base studies and the outcomes of engagement. The Core Strategy:

- ▶ Sets out the broad aims and objectives for sustainable development within the Bradford District for the next 15-20 years until 2030;
- ▶ Set out broad policies for steering and shaping development;
- ▶ Set out broad locations for new housing and employment growth and infrastructure investment;
- ▶ 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.

Following consultation on the Core Strategy Issues and Options² in January 2007, the Further Engagement Draft Core Strategy³ (October 2011) and the Publication Draft Core Strategy⁴ (February 2014). The Council

¹ City of Bradford Metropolitan District Council Publication Draft Core Strategy (2014). Available from http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Core_Strategy_DPD_Publication_Draft [Accessed November 2015].

² City of Bradford Metropolitan District Council Core Strategy Issues and Options (2007). Available from http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_issues_and_options_stage_dpd [Accessed November 2015].

³ City of Bradford Metropolitan District Council Core Strategy Further Engagement Draft (2001). Available from http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_preferred_options_stage [Accessed November 2015].

⁴ City of Bradford Metropolitan District Council Publication Draft Core Strategy (2014). Available from http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Core_Strategy_DPD_Publication_Draft [Accessed November 2015].

then submitted the Core Strategy Publication Draft to the Secretary of State, for public examination by an independent Planning Inspector, on Friday 12th of December 2014.

The Examination in Public (EiP) commenced in 2015 with Stage 1 Hearings taking place between Wednesday 4th of March until Friday 20th of March 2015. Both during the hearings and subsequent to them a number of issues were raised by the Inspector which required further 'homework' statements and these have in turn led to some of the modifications which are the subject of this addendum. Other modifications have been generated by updated and new evidence, most notably updated land supply information in the Council's third Strategic Housing Land Availability Assessment (SHLAA), an updated Gypsy and Traveller Accommodation Assessment and revisions to the Habitat Regulations Assessment (HRA). The review of the HRA which deals with the potential impacts of the Plan's development strategy on the Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) within the district has been a particularly significant piece of work carried out in conjunction with Natural England.

Further information about the preparation of the Bradford Core Strategy is set out in Section 1.3 of this addendum report and is available via the Council's website:

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_introduction_dpd

What are the Proposed Policy Changes?

The proposed policy changes affect 17 policies and combine a mix of amendments, some of which are substantive, some of which are minor and in one case, has led to a drafting of a new replacement policy.

For a number of the policies, the proposed policy changes are 'minor' amendments to provide clarification following the EiP hearings. These minor amendments, along with the Sustainability Appraisal (SA) of the Publication Draft Core Strategy version of the policy have been reviewed to determine whether the SA is still appropriate and identifies all relevant sustainability effects. It has been concluded that for 4 policies, the minor amendments have not changed the findings of the previous appraisals, and as such, these 4 policies have not been re-appraised as part of this addendum as the previous SA remains an appropriate description of the likely significant effects of the policy.

The remaining proposed policy changes to the policies in the Publication Draft Core Strategy are considered more substantive which in consequence has affected the findings of the earlier SA.

Table NTS1 provides an overview of the proposed policy changes and identifies those policies which have been subject to further SA.

Table NTS 1 Proposed Policy Changes

Policy	Summary of Amendment	SA Re-appraisal Required?
Strategic Policies		
SC3 – Working Together	Minor policy wording amendments to provide clarification on the application of the policy.	No
SC4 – Hierarchy of Settlements	Addition of Burley in Wharfedale and Menston as Local Growth Centres to reflect the revised HRA and related increased housing targets for Burley and Menston.	Yes
SC7 – Green Belt	Amended policy wording to Criterion B to provide clarity on exceptional circumstances which support the need to review the green belt as part of the Local Plan in accordance with paragraph 82 of the NPPF.	Yes
SC8 – Protecting the South Pennine Moors and the South Pennine Moors SAC and their zone of influence	Policy comprehensively redrafted as a result of a process initiated by the Inspector as part of the examination hearings and agreed with Natural England.	Yes

Policy	Summary of Amendment	SA Re-appraisal Required?
Sub Area Policies		
BD1 – The Regional City of Bradford including Shipley and Lower Baildon	Housing numbers for the Bradford City sub area reduced as a consequence of the main modification to Policy HO3 to housing distribution.	Yes
AD1 - Airedale	Housing numbers for the Airedale sub area increased slightly as a consequence of the main modification to Policy HO3 to housing distribution.	Yes
WD1 - Wharfedale	Housing numbers for the Wharfedale sub area increased significantly as a consequence of the main modification to Policy HO3 to housing distribution. This in part reflects the change in status of Burley in Wharfedale and Menston to Local Growth Centres.	Yes
PN1 – South Pennine Towns and Villages	Housing numbers for the South Pennine Towns and Villages sub area reduced slightly as a consequence of the main modification to Policy HO3 to housing distribution.	Yes
Thematic Policies: Economy and Jobs		
EC1- Creating a successful and competitive Bradford District economy within the Leeds City region	Additional policy wording to provide reference to the meaning or application of the term 'Economic Growth Area'.	No
EC2 – Supporting Business and Job Creation	Annual new jobs target reduced to provide a clear indication of realistic and achievable projected jobs growth rather than an aspirational target.	Yes
Thematic Policies: Housing		
HO3 – Distribution of Housing Development	Amended policy wording to ensure consistency with Policy HO1. Amended apportionment percentages for the 3 DPD's to give greater precision and amended settlement targets to reflect changes to the evidence base most notably in Burley in Wharfedale, Menston and Shipley.	Yes
HO4 – Phasing the Release of Housing Sites	Two additional policy criteria to ensure delivery of required housing quantum's and ensure the plan is adaptable and responsive to any future scenario, however unlikely, where there is an insufficient supply of deliverable sites. The policy is also amended to remove the Canal Road Corridor and Bradford City Centre DPD's from the phasing approach. This change ensures a larger supply of land in those areas is released at the start of the plan period to support housing delivery and support their regeneration.	Yes
HO9 – Housing Quality	Minor policy wording amendments to ensure policy is consistent with latest National Planning Policy with regards to national housing standards.	No
HO11 – Affordable Housing	Minor policy wording amendments to ensure policy is consistent with latest National Planning Policy with regards to affordable housing thresholds	No

Policy	Summary of Amendment	SA Re-appraisal Required?
HO12 – Sites for Travellers and Travelling Showpeople	Amended targets for the provision of pitches and plots informed by an updated Gypsy & Traveller Accommodation Assessment. The target for pitches for Gypsies and Travellers is reduced slightly and the target for plots for travelling showpeople is increased slightly. Amended policy wording to: make clear the need to work closely with the community, in particular representatives of the traveller community; and ensure consistency with Policy HO3 by indicating the proposed provision is a minimum.	Yes
Thematic Policies: Environment		
EN2 – Biodiversity and Geodiversity	Addition of new policy criteria specifically addressing Sites of Special Scientific Interest to provide clarification and in response to representations from Natural England. Minor policy wording amendments to provide clarification and ensure clarity of the policy in response to issues raised during the Examination process.	Yes
Thematic Policies: Waste		
WM1 – Waste Management	Policy amended to enhance the strategic framework and spatial direction for the Waste Management DPD.	Yes

The policy changes listed above, together with the remaining Draft Core Strategy policies that are unchanged since the Core Strategy was submitted in 2014 for examination, form the Council's revised Core Strategy.

Further information relating to the proposed policies is contained in Section 3.2 of the addendum.

What is Sustainability Appraisal?

It is very important that the Bradford Core Strategy contributes to a sustainable future for the plan area. To support this objective, the Council is required to carry out a Sustainability Appraisal (SA) of the Core Strategy⁵. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised and also incorporates a process set out under a European Directive⁶ and related UK regulations⁷ called Strategic Environmental Assessment (SEA).

SA has been undertaken at all of the key stages in the development of the Core Strategy. The SA of the Publication Draft Core Strategy was undertaken in February 2014. To ensure that the final, adopted Local Plan takes into account sustainability considerations, and to meet the Council's responsibilities under the SEA Directive, it is necessary to appraise the proposed main modifications to the Draft Core Strategy.

Section 1.4 of the addendum describes in further detail the requirement for SA of local plans and the SA process in respect of the Bradford Core Strategy.

⁵ The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

⁶ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

⁷ Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

How Have the Proposed Policy Changes Been Appraised?

To support the appraisal of the Core Strategy, a SA Framework has been developed. This contains a series of sustainability objectives and guide questions that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the Core Strategy and the objectives contained within other plans and programmes reviewed for their relevance to the SA and the Core Strategy. The SA objectives are shown in **Table NTS 2**.

Table NTS 2 SA Objectives Used to Appraise the Proposed Policy Changes

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

The SA of the Proposed Policy Changes has considered the 17 policies listed in **Table NTS1**. Each policy, where the proposed change warrants further appraisal has been appraised against the SA objectives. For each SA objective, an overall 'score' has been provided according to the scoring system in **Table NTS 3** below.

Table NTS 3 Scoring System Used in the SA of the Policy Appraisals

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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Section 3 of the addendum provides further information in relation to the approach to the appraisal of the Proposed Policy Changes.



The Council has completed a separate appraisal of the options for policy SC8 which is contained in Appendix B to this Addendum.

What are the Findings of the Appraisal of the Proposed Policy Changes?

Overall the reassessments of those policies which have either been significantly redrafted or amended against the SA objectives have not been changed as a result of the Proposed Modifications. This is because the overall principle of those policies has not been altered. Nevertheless, where policies have been amended – notably those where housing numbers and employment targets have been reduced – the new figures in these policies are considered to have potential effects on a number of the SA objectives in comparison with how the policy was originally drafted.

A reduced annual jobs target would provide less employment opportunities to the people of Bradford and so the extent of any positive benefit (with regard to well-being, social cohesion and the access to services) would be lessened. However it is considered that an overall increase in job numbers will still have positive impacts and so as noted above the overall assessment remains unchanged.

In conclusion, although the actual numbers for housing in some locations and/or jobs have been changed – some increased, some reduced - these changes are not considered sufficient to change the overall assessment of these policies against the SA objectives, in that there is still a net gain.

The exceptional circumstances for Green Belt release leading to land being brought forward for housing that is currently identified as being in more sustainable locations and land for employment being in marketable locations is still considered to be consistent with overall approach to the location of development in the Core Strategy (as set out in Policy SC5) and the requirement in Policy H06 to maximise the use of PDL.

Detailed appraisal matrices for each policy are contained at Appendix A to the addendum. The appraisal findings are summarised in further detail in Section 3 of the addendum, with an overall summary of policy performance provided in NTS Table 4 below.

Table NTS 4 Summary of SA Appraisal of Revised and Amended Proposed Modification Core Strategy Policies

SA Objectives	Policy SC4	Policy SC7	Policy SC8	Policy BD1	Policy AD1	Policy WD1	Policy PN1	Policy EC2	Policy HO3	Policy HO4	Policy HO12	Policy EN2	Policy WM1
1. Ensure the prudent and efficient use of natural resources	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	++
3. Reduce the district's impact on climate change and vulnerability to its effects	+	?	0	+ / ?	++	?	+	0	++	0	0	0	+
4. Safeguard and improve air, water and soil resources	?	?	+ / ?	++ / ? / -	?	? / +	? / -	+ / ?	--	0	+	++	+
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	+ / -	?	++	++	++	+	++	?	? / +/-	+	+	++	0
6. Maintain and enhance the character of natural and man-made landscapes	+ / -	-	+	-	-	-	-	?	?	+	+	++	0
7. Protect and enhance historic assets and their settings	?	?	? / 0	++	++	++	+	?	?	0	0	0	0
8. Provide the opportunity for everyone to live in quality housing which reflects individual's needs, preferences and resources	+	+	? / +	++	++	++	+	++	++	++	++	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
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	+	+	0	+	+ / ?	? / ++	++	++	++	0	0	0	0
11. Improve the quality of the built environment and make efficient use of land and buildings	+ / -	+ / -	0	- / ++	- / ++	- / ++	++ / -	++	? / -	++	+	0	0
12. Improve the quality and range of services available within communities and connections to wider networks	+	0	0	++ / ?	+ / ?	? / +	+	0	0	0	0	0	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	+	0	0	++	++	++	+	?	+	0	++	0	0

SA Objectives	Policy SC4	Policy SC7	Policy SC8	Policy BD1	Policy AD1	Policy WD1	Policy PN1	Policy EC2	Policy HO3	Policy HO4	Policy HO12	Policy EN2	Policy WM1
14. Create good cultural, leisure and recreation activities available to all	+	?	+	++ / ?	+	+	+	0	0	0	0	0	0
15. Improve safety and security for people and property	+	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
17. Promote education and training opportunities which build the skills and capacity of the population	+	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
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	+	+	0	++	++	+	?	++	0	0	0	0	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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Next Steps

This addendum to the SA Report is being published for consultation alongside the Council's proposed main modifications. The consultation will run from **25th November 2015 to 20th January 2016**.

The responses to the consultation will be considered by the independent Inspector once the EiP has recommenced. The Council will then consider the sustainability implications of any subsequent changes to the Core Strategy and whether any further assessment is needed in accordance with the requirements of the SEA Directive.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of the addendum. In particular, we would like to hear your views as to whether the report identifies the likely significant effect of the proposed main modifications to the draft Core Strategy and whether there are any likely significant effects which have not been considered.

Please provide your comments by 20th January 2016.

Representations must be made in writing and are strongly encouraged to be submitted electronically on the official Representation Form.

Representations may be submitted electronically via E-mail to: planning.policy@bradford.gov.uk or by post to:

Local Plan Group
City of Bradford Metropolitan District Council
2nd Floor South Jacobs Well
Nelson Street
Bradford
BD1 5RW

The proposed modifications to Core Strategy Publication Draft and key support documents including the SA Addendum will be available online at:

<http://www.planning-inspectorate.gov.uk>.

They will also be available for public inspection during the 8 week period at the following **Council Offices** (Mon-Thurs 9am-5pm; Fri 9am-4.30pm) and at the main **local libraries** (Mon-Fri 9am-7pm; Sat 9am - 5pm):

Main Council Offices

- ▶ Planning Reception, Jacobs Well, Nelson Street, Bradford, BD1 5RW;
- ▶ Shipley Town Hall, Kirkgate, Shipley, BD18 3EJ;
- ▶ Keighley One Stop Shop, Town Hall, Bow Street, Keighley, BD21 3SX;
- ▶ Ilkley Town Hall, Station Road, Ilkley, LS29 8HA (*By appointment only).

Main Local Libraries

- ▶ Bradford City Library, Centenary Square, Bradford, BD1 1NN;
- ▶ Bradford Local Studies, Sharpe Street / Princes Way, Bradford, BD1 1SD (Former Central Library);



- ▶ Bingley Library, Myrtle Walk, Bingley, BD16 1AW;
- ▶ Keighley Library, North Street, Keighley, BD21 3SX;
- ▶ Ilkley Library, Station Road, Ilkley, LS29 8HA.

Further Information

For further information please contact the Local Plan Group by phone on (01274) 433679 or by E-mail at: planning.policy@bradford.gov.uk.

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Appendix B	Policy SC8 Options Appraisal

1. Introduction

1.1 Background

The City of Bradford Metropolitan District Council (CBMDC) submitted the Publication Draft Core Strategy⁸ (the draft Local Plan) to the Planning Inspectorate on 12th December 2014, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012⁹. The Publication Draft Core Strategy sets out the vision, plan objectives, planning policies that will, once adopted, guide development in the District to 2030. Amec Foster Wheeler Environment and Infrastructure UK Limited (Amec Foster Wheeler) was commissioned by CBMDC to undertake a Sustainability Appraisal (SA), incorporating Strategic Environment Assessment (SEA), of the Publication Draft Core Strategy. A SA Report¹⁰ presenting the findings of this assessment was submitted alongside the Publication Draft Core Strategy to the Planning Inspectorate.

The Examination in Public (EiP) into the Publication Draft Core Strategy commenced in December 2014. The Inspector held a series of hearings as part of the Examination process and these ran from Wednesday 4 March until Friday 20 March 2015. A number of issues were debated in the hearings which has resulted in the Council making a number of proposed main modifications to the Core Strategy, which has included work to revise the Habitats Regulations Assessment (HRA), revisions to the number and distribution of housing proposed in sub areas and an updated Gypsy and Traveller Accommodation Assessment. Other changes have also been made to the Publication Draft Core Strategy in light of the hearings to ensure that the Core Strategy is based upon up to date evidence base work and reflects any changes in national planning policy.

Each of the revised policies must be subject to SA in order that the policies in the Core Strategy which will guide future development in Bradford have taken into account sustainability considerations. It is also necessary to assess the cumulative effects of the revised suite of policy changes in terms of its sustainability.

1.2 Purpose of this Report

This document is an addendum to the Bradford Core Strategy Publication Draft: Sustainability Appraisal Report. This addendum presents the findings of the appraisal of the amended policies. The addendum is being published alongside the Council's proposed main modifications to the Draft Core Strategy for public consultation. This addendum should be read in conjunction with the Bradford Core Strategy Publication Draft: Sustainability Appraisal Report found at:

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Sustainability_Appraisal

⁸ City of Bradford Metropolitan District Council (2014) *City of Bradford Metropolitan District Council Core Strategy Publication Draft*. Available from

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Core+Strategy+DPD+Publication+Draft.htm [Accessed November 2015].

⁹ Statutory Instrument 2012 No. 767 *The Town and Country Planning (Local Planning) (England) Regulations 2012*. Available from http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf [Accessed November 2015].

¹⁰ AMEC Environment and Infrastructure UK Ltd (2014) *Sustainability Appraisal of the Bradford Core Strategy Submission Draft: Sustainability Appraisal Report*. Available from

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Sustainability_Appraisal [Accessed November 2015].

1.3 Bradford Core Strategy

Requirement to Prepare a Local Plan

The National Planning Policy Framework (NPPF) (March, 2012)¹¹ sets out (at paragraphs 150-157) that each local planning authority should prepare a local plan for its area. Local plans should set out the strategic priorities and policies to deliver:

- ▶ The homes and jobs needed in the area;
- ▶ The provision of retail, leisure and other commercial development;
- ▶ The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- ▶ The provision of health, security, community and cultural infrastructure and other local facilities; and
- ▶ Climate change mitigation and adaptation and conservation and enhancement of the natural and historic environment, including landscape.

Planning Practice Guidance (2014)¹² clarifies (at paragraph 002 'Local Plans') that local plans "*should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered*".

Examination in Public

The EiP into the Draft Core Strategy commenced in December 2014 when the Core Strategy Publication Draft was submitted to the Secretary of State, for public examination by an independent Planning Inspector. The Inspector held a series of hearings as part of the Examination process and these ran from Wednesday 4th March until Friday 20th March 2015.

During the hearings there was discussion about the HRA which accompanies the Core Strategy and the features for which the SPA has been classified. Review work has been undertaken, focusing on the interpretation of bird data gathered during earlier survey work and the HRA of plan modification has taken place. The Council have also undertaken work on revising the distribution of new housing in light of work on a revised HRA.

In addition, the Council have undertaken an updated Gypsy and Traveller Accommodation Assessment¹³ (GTAA) in support of Core Strategy Policy HO12 to ensure that the Core Strategy is based upon robust and up to date evidence that reflects the needs of this community. The findings of the study have required modifications to Core Strategy Policy HO12 and supporting text and this is included in the proposed main modifications to the Core Strategy.

In addition to these changes the Council have made other updates to the Core Strategy to take account of updated evidence base work which has been carried out in support of the Core Strategy and to reflect any changes in national planning policy.

¹¹ Department for Communities and Local Government (2012) *National Planning Policy Framework*. Available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf [Accessed November 2015].

¹² Department for Communities and Local Government (2014) *Planning Practice Guidance*. Available from <http://planningguidance.planningportal.gov.uk/> [Accessed November 2015].

¹³ Updated GTAA available at http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/evidence_base_gypsy_and_travellers_accommodation_assessment [Accessed November 2015].

A summary of the proposed policy changes are presented in **Table 1.1**.

Table 1.1 Proposed Policy Changes

Policy	Summary of Amendment
SC3 – Working Together	Minor policy wording amendments to provide clarification on the application of the policy.
SC4 – Hierarchy of Settlements	Addition of Burley in Wharfedale and Menston as Local Growth Centres to reflect the revised HRA and related increased housing targets for Burley and Menston.
SC7 – Green Belt	Amended policy wording to Criterion B to provide clarity on exceptional circumstances which support the need to review the green belt as part of the Local Plan in accordance with paragraph 82 of the NPPF.
SC8 – Protecting the South Pennine Moors and the South Pennine Moors SAC and their zone of influence	Policy was redrafted as a result of a process initiated by the Inspector as part of the examination.
BD1 – The Regional City of Bradford including Shipley and Lower Baildon	Housing numbers for the Bradford City sub area reduced as a consequence of the main modification to Policy HO3 to housing distribution.
AD1 - Airedale	Housing numbers for the Airedale sub area increased slightly as a consequence of the main modification to Policy HO3 to housing distribution.
WD1 - Wharfedale	Housing numbers for the Wharfedale sub area increased significantly as a consequence of the main modification to Policy HO3 to housing distribution. This in part reflects the change in status of Burley in Wharfedale and Menston to Local Growth Centres.
PN1 – South Pennine Towns and Villages	Housing numbers for the South Pennine Towns and Villages sub area reduced slightly as a consequence of the main modification to Policy HO3 to housing distribution.
EC1- Creating a successful and competitive Bradford District economy within the Leeds City region	Additional policy wording to provide reference to the meaning or application of the term 'Economic Growth Area'.
EC2 – Supporting Business and Job Creation	Annual new jobs target reduced to provide a clear indication of projected jobs growth rather than an aspirational target.
HO3 – Distribution of Housing Development	Amended policy wording to ensure consistency with Policy HO1. Amended apportionment percentages to give greater precision and amended settlement targets to reflect changes to individual settlement apportionments notably Burley in Wharfedale, Menston and Shipley.
HO4 – Phasing the Release of Housing Sites	Two additional policy criteria to ensure delivery of required housing quantum and ensure the plan is adaptable and responsive to any future scenario, however unlikely, where there is an insufficient supply of deliverable sites. The policy is also amended to remove the Canal Road Corridor and Bradford City Centre DPD's from the phasing approach. This change ensures a larger supply of land in those areas is released at the start of the plan period to support housing delivery and support their regeneration.
HO9 – Housing Quality	Minor policy wording amendments to ensure policy is consistent with latest National Planning Policy with regards to national housing standards.
HO11 – Affordable Housing	Minor policy wording amendments to ensure policy is consistent with latest National Planning Policy with regards to affordable housing thresholds
HO12 – Sites for Travellers and Travelling Showpeople	Amended targets for the provision of pitches and plots informed by an updated Gypsy & Traveller Accommodation Assessment. The target for pitches for Gypsies and Travellers is reduced slightly and the target for plots for travelling showpeople is increased slightly. Amended policy wording to: make clear the need to work closely with the community, in particular representatives of the traveller community; and ensure consistency with Policy HO3 by indicating provision is a minimum.

Policy	Summary of Amendment
EN2 – Biodiversity and Geodiversity	<p>Addition of new policy criteria specifically addressing Sites of Special Scientific Interest to provide clarification and in response to representations from Natural England.</p> <p>Minor policy wording amendments to provide clarification and ensure clarity of the policy in response to issues raised during the Examination process.</p>
MW1 – Waste Management	Policy amended to enhance the strategic framework and spatial direction for the Waste Management DPD.

1.4 Sustainability Appraisal

Requirement for Sustainability Appraisal

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive¹⁴, and its transposing regulations the Environmental Assessment of Plans and Programmes Regulations 2004¹⁵.

The SEA Directive and transposing regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is *“to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”*

At paragraphs 150-151, the NPPF sets out that local plans are key to delivering sustainable development and that they must be prepared with the objective of contributing to the achievement of sustainable development. Paragraph 165 reiterates the requirement for SA/SEA as it relates to local plan preparation:

“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”

The Planning Practice Guidance also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is “justified”, a key test of soundness that concerns the extent to which the plan is the most appropriate strategy, when considered against the reasonable alternatives and available and proportionate evidence.

Sustainability of the Bradford Core Strategy

SA has been an integral part of the preparation of the Draft Core Strategy with each stage of the Core Strategy development having been accompanied by a SA, as follows:

- ▶ Core Strategy Issues and Options: Initial Sustainability Appraisal Report (2007);

¹⁴ Available from <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32001L0042&from=EN> [Accessed November 2015].

¹⁵ Statutory Instrument 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations 2004*. Available from http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf [Accessed November 2015].

- ▶ Core Strategy Further Issues and Options for Consultation: Initial Sustainability Appraisal: (2008);
- ▶ Sustainability Appraisal of the Bradford Core Strategy: Issues and Options Report and Appendices (2009);
- ▶ Sustainability Appraisal of the Bradford Core Strategy – Further Engagement Draft (November 2011): Interim Sustainability Appraisal Report (2011); and
- ▶ Sustainability Appraisal of the Bradford Core Strategy Publication Draft: Sustainability Appraisal Report (2014)¹⁶.

The SA of the Publication Draft Core Strategy was undertaken in February 2014. The SA Report was prepared to meet the reporting requirements of the SEA Directive and assessed:

- ▶ The Bradford vision and plan objectives;
- ▶ The preferred quantum of growth and the preferred development option;
- ▶ Proposed policies; and
- ▶ The cumulative, synergistic and secondary effects of the draft Core Strategy, both alone and in-combination with other plans and programmes.

To ensure that the final, adopted Core Strategy takes into account sustainability considerations, and to meet the Council's responsibilities under the SEA Directive, it is necessary to appraise the proposed main modifications to the draft Core Strategy as detailed in **Section 1.3**. This addendum presents the findings of this appraisal.

1.5 Structure of This Addendum

This addendum to the draft Core Strategy SA Report is structured as follows:

- ▶ **Section 1: Introduction** - Includes a summary of the draft Core Strategy and the Council's proposed main modifications, an overview of SA and outline of the report contents;
- ▶ **Section 2: Approach to the Sustainability Appraisal** - Outlines the approach to the SA of the proposed main modifications including the SA Framework;
- ▶ **Section 3: Appraisal of Effects** – Summarises the findings of the appraisal of the proposed main modifications;
- ▶ **Section 4: Conclusions and Next Steps**– Presents the conclusions of the SA and the next steps in the SA process.

1.6 How to Comment on this Addendum

This addendum to the SA Report is being published for consultation alongside the Council's Proposed Core Strategy Main Modifications between **25th November 2015 and 20th January 2016**. The responses received will be considered by the independent Inspector once the EiP has recommenced.

¹⁶ All available at

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Sustainability_Appraisal [Accessed November 2015].

1.7 This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of the addendum. In particular, we would like to hear your views as to whether the report identifies the likely significant effect of the proposed main modifications to the sites and whether there are any likely significant effects which have not been considered.

Please provide your comments by 20th January 2016.

Representations must be made in writing and are strongly encouraged to be submitted electronically on the official Representation Form.

Representations may be submitted electronically via E-mail to: planning.policy@bradford.gov.uk or by post to:

Local Plan Group
City of Bradford Metropolitan District Council
2nd Floor South Jacobs Well
Nelson Street
Bradford
BD1 5RW

The proposed modifications to Core Strategy Publication Draft and key support documents including the SA Addendum will be available online at:

<http://www.planning-inspectorate.gov.uk>.

They will also be available for public inspection during the 8 week period at the following **Council Offices** (Mon-Thurs 9am-5pm; Fri 9am-4.30pm) and at the main **local libraries** (Mon-Fri 9am-7pm; Sat 9am - 5pm):

Main Council Offices

- ▶ Planning Reception, Jacobs Well, Nelson Street, Bradford, BD1 5RW;
- ▶ Shipley Town Hall, Kirkgate, Shipley, BD18 3EJ;
- ▶ Keighley One Stop Shop, Town Hall, Bow Street, Keighley, BD21 3SX;
- ▶ Ilkley Town Hall, Station Road, Ilkley, LS29 8HA (*By appointment only).

Main Local Libraries

- ▶ Bradford City Library, Centenary Square, Bradford, BD1 1NN;
- ▶ Bradford Local Studies, Sharpe Street / Princes Way, Bradford, BD1 1SD (Former Central Library);
- ▶ Bingley Library, Myrtle Walk, Bingley, BD16 1AW;
- ▶ Keighley Library, North Street, Keighley, BD21 3SX;
- ▶ Ilkley Library, Station Road, Ilkley, LS29 8HA.

Further Information

For further information please contact the Local Plan Group by phone on (01274) 433679 or by E-mail at: planning.policy@bradford.gov.uk.

2. Approach to Sustainability Appraisal

2.1 Introduction

This section outlines the methodology used to appraise the proposed main modifications to the draft Core Strategy and sets out the objectives against which the revised policies have been appraised. The SA objectives used for this appraisal are consistent with those developed to appraise the draft Core Strategy and were consulted upon in the 2007 Scoping Report¹⁷, and which Amec Foster Wheeler (formerly Entec UK Ltd) reviewed and updated the scoping information and SA objectives on behalf of the Council in November 2008. The appraisal objectives reflect an analysis of baseline conditions, review of plans and programmes and the subsequent identification of key sustainability issues which are contained in the draft Core Strategy SA Report.

2.2 Sustainability Appraisal Framework

The SA Framework comprises sustainability objectives and guide questions to inform the appraisal. Establishing appropriate SA objectives and guide questions is central to appraising the sustainability effects of the proposed policy changes. Broadly, the SA objectives define the long term aspirations for the plan area with regard to social, economic and environmental considerations and it is against these objectives that the performance of the proposed policy changes identified in **Section 1.3** have been appraised.

Table 2.1 presents the SA Framework including the SA objectives and associated guide questions. The SA objectives and guide questions reflect the analysis of the key objectives and policies arising from the review of plans and programmes, key sustainability issues identified through the analysis of the socio-economic and environmental baseline conditions and comments received during consultation on the Scoping Report.

Table 2.1 SA Framework

SA Objective	Decision Making Criteria
Impacts on the Environment and Resources	
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	▶ Does the plan seek to increase energy efficiency in building stock?
	▶ Does the plan encourage the use of clean, low carbon, energy efficient technologies?
	▶ Does the plan promote renewable energy generation in the district?
	▶ Does the plan seek to minimise the consumption of non renewable resources and promote the use of sustainable and locally sourced resources and materials?
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	▶ Does the plan seek to minimise waste generation and increase re-use, recycling and recovery consistent with the waste hierarchy?
	▶ Does the plan encourage sustainable production / consumption and resource efficiency?
	▶ Does the plan propose positive measures to divert waste away from landfill?
	▶ Does the plan seek to improve access for all to facilities for waste management?

¹⁷ City of Bradford Metropolitan District Council Initial Sustainability Appraisal 2007. Available from: http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Sustainability_Appraisal [Accessed November 2015].

SA Objective	Decision Making Criteria
3. Reduce the district's impact on climate change and vulnerability to its effects	<ul style="list-style-type: none"> ▶ Does the plan seek to limit or reduce the emission of greenhouse gases (carbon dioxide, methane, nitrogen oxide etc) in accordance with the Climate Change Act 2008? ▶ Does the plan ensure that development can withstand, and adapt to, local impacts resulting from global climate change? ▶ Does the plan consider the potential environmental, social and economic implications of climate change?
4. Safeguard and improve air, water and soil resources	<ul style="list-style-type: none"> ▶ Does the plan ensure the conservation and sustainable use of ecosystem services? ▶ Does the plan seek to limit or reduce the emission of air pollutants and improve local air quality? ▶ Does the plan prevent the pollution of water resources and seek to improve the quality of all water resources? ▶ Does the plan prevent soil degradation and contamination, and afford protection to good quality agricultural land and soils? ▶ Does the plan prevent inappropriate development in floodplains and promote the use of Sustainable Drainage Systems (SuDS) and other such measures to prevent or reduce flood risk?
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<ul style="list-style-type: none"> ▶ Does the plan afford protection to Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs) and other designated sites, including regional and local sites, such as, SEGIs and Bradford Wildlife Areas? ▶ Does the plan protect and conserve habitats and species, especially where these may be rare, declining, threatened or indigenous? ▶ Does the plan provide for the sustainable long term management of wildlife habitats? ▶ Does the plan seek to prevent habitat and wildlife corridor fragmentation? ▶ Does the plan promote new habitat creation and restoration, including green infrastructure networks?
6. Maintain and enhance the character of natural and man made landscapes	<ul style="list-style-type: none"> ▶ Does the plan protect areas of high landscape value, greenspace and open space in urban and rural areas and promote the restoration and enhancement of the landscape? ▶ Does the plan ensure development contributes to local distinctiveness and character, taking account of the surrounding landscape context? ▶ Does the plan protect and enhance individual landscape features such as hedgerows, dry stone walls, ponds and trees? ▶ Does the plan afford protection to geological SSSIs, Regionally Important Geological Sites (RIGS) and Sites of Ecological or Geological Importance (SEGIs)?
7. Protect and enhance historic assets and their settings	<ul style="list-style-type: none"> ▶ Does the plan preserve, protect and enhance sites, features and areas of cultural, historic and archaeological value and their settings, including the district's Conservation Areas, Scheduled Monuments, listed and locally listed buildings, Registered Parks and Gardens and Historic Battlefields? ▶ Does the plan protect and enhance the character and appearance of the Saltaire World Heritage Site and its setting and provide for its sustainable long term management? ▶ Does the plan protect and enhance important cultural and historic vistas, views and key reference points? ▶ Does the plan promote the restoration and sensitive reuse of derelict and degraded cultural and historic buildings?

SA Objective	Decision Making Criteria
Social Impacts	
8. Provide the opportunity for everyone to live in quality housing which reflects individuals needs, preferences and resources	<ul style="list-style-type: none"> ▶ Does the plan ensure that the housing offer and mix meets local housing needs, taking into account tenure, location, size, type, density and affordability? ▶ Does the plan ensure the provision of sufficient new homes taking into account need and demand and seeking to improve choice, particularly appropriate levels of affordable housing where there is a need? ▶ Does the plan ensure the development of high quality sustainable housing that is well designed and built to a high standard (e.g. Code for Sustainable Homes Level 3 and Lifetime Homes)? ▶ Does the plan seek to create sustainable, inclusive and mixed communities and ensure fair access to housing for all groups?
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	<ul style="list-style-type: none"> ▶ Does the plan ensure access for all groups, particularly the disabled and those without a car? ▶ Does the plan provide new or improved integrated public transport to address gaps in the public transport network and service provision? ▶ Does the plan encourage community transport, green travel plans and car sharing schemes? ▶ Does the plan provide innovative solutions (demand management) to reduce traffic congestion; maintain capacity in the road network; and seek to improve road safety for all users?
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	<ul style="list-style-type: none"> ▶ Does the plan seek to reduce the need to travel, especially by car? ▶ Does the plan promote public transport use, walking and cycling as alternative forms of transport to the car? ▶ Does the plan protect and enhance the Public Rights of Way and cycle network within the district? ▶ Does the plan ensure the provision of the necessary infrastructure and space to enable residents to live and work in close proximity?
11. Improve the quality of the built environment and make efficient use of land and buildings	<ul style="list-style-type: none"> ▶ Does the plan promote high standards of sustainable design and construction? ▶ Does the plan ensure that development contributes to and enhances the character of the built environment and public realm, strengthens local distinctiveness and creates a sense of place? ▶ Does the plan seek to reduce light pollution, noise levels, fly tipping and the spread of litter and graffiti? ▶ Does the plan ensure the efficient use of land and buildings?
12. Improve the quality and range of services available within communities and connections to wider networks	<ul style="list-style-type: none"> ▶ Does the plan ensure the provision of a range of services and facilities to meet local and / or regional needs? ▶ Does the plan seek to ensure access for everyone to all services and facilities, particularly the disabled and those without a car? ▶ Does the plan help retain essential local services and facilities, particularly in rural areas?
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	<ul style="list-style-type: none"> ▶ Do plan policies respect the needs of all communities and future generations? ▶ Does the plan ensure equality and diversity? ▶ Does the plan promote a sense of community identity and encourage social cohesion and shared values? ▶ Does the plan identify and tackle issues around social exclusion?
14. Create good cultural, leisure and recreation activities available to all	<ul style="list-style-type: none"> ▶ Does the plan protect and seek to enhance the provision of cultural, leisure and recreation facilities? ▶ Does the plan ensure the provision of high quality play and open space for children and young people? ▶ Does the plan protect and enhance greenspace and open space, especially that within urban areas? ▶ Does the plan facilitate access to, and opportunities to enjoy, the countryside?

SA Objective	Decision Making Criteria
15. Improve safety and security for people and property	<ul style="list-style-type: none"> ▶ Does the plan seek to create a safe environment with low levels of crime and disorder? ▶ Does the plan seek to prevent and reduce crime and anti-social behaviour and fear of crime through design measures (e.g. the incorporation of Secured by Design Principles)? ▶ Does the plan seek to address the causes of crime and disorder and / or reduce crime through intervention?
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	<ul style="list-style-type: none"> ▶ Does the plan ensure the provision of easy to use health and social care services and facilities that meet local needs and are accessible to all? ▶ Does the plan seek to reduce health inequalities within society (address the gap between those with the worst health and those with better health)? ▶ Does the plan seek to improve people's quality of life, health and well being and to prevent ill health (e.g. by encouraging active lifestyles)? ▶ Does the plan help people to maintain their independence and enable informed choices throughout life to remain healthy and well?
Economic Impacts	
17. Promote education and training opportunities which build the skills and capacity of the population	<ul style="list-style-type: none"> ▶ Does the plan ensure the provision of education and training facilities that meet local needs and that are accessible to all? ▶ Does the plan support skills and training development in the local community and will it contribute towards meeting identified skills shortages? ▶ Does the plan support collaboration between educational establishments, businesses and industry?
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	<ul style="list-style-type: none"> ▶ Does the plan provide employment opportunities for local people? ▶ Does the plan contribute to improving the variety and quality of employment opportunities? ▶ Does the plan promote or support equal employment opportunities? ▶ Does the plan ensure employment sites are accessible to everyone, particularly those without a car?
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	<ul style="list-style-type: none"> ▶ Does the plan provide the right conditions, including sites, premises and infrastructure to encourage sustainable investment and enterprise, taking into account current and future working environments? ▶ Does the plan encourage market sector diversification, to prevent and reduce dependency on specific markets and industries? ▶ Does the plan support existing local businesses, products and services and help build local supply chains, particularly in rural areas? ▶ Does the plan help increase business start up rates and seek to improve the competitiveness and productivity of the local economy? ▶ Does the plan support and promote sustainable consumption and production (i.e. cleaner efficient production processes, a shift in consumption towards goods and services with lower environmental impacts etc)?

2.3 Appraisal of Proposed Core Strategy Changes

The SA of the proposed Core Strategy changes has considered a total of 17 policies where policies have changed since the draft Core Strategy was submitted for examination in 2014. Each policy, where the proposed change warrants further appraisal, has been appraised against the SA objectives.

Consistent with the approach adopted to the appraisal of the policies in the Draft Core Strategy SA Report, the same tailored SA matrix has been used to support the assessments of the proposed policy changes. This matrix uses the 19 SA objectives and guide questions taken from the 2007 Scoping Report.

For each SA objective, an overall 'score' was provided according to the scoring system in **Table 2.2** below:

Table 2.2 Scoring System Used in the SA of Policies

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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The appraisal pro forma matrix for each policy assessment is contained at **Appendix A** and the appraisal findings are summarised in **Section 3**. This section includes an appraisal of the proposed policy changes which have been appraised as part of the proposed main modifications to the Core Strategy following the examination.

A separate appraisal of the options for policy SC8 has also been completed.

2.4 When the SA was Undertaken and by Whom

This SA of the proposed site changes to the draft Local Plan was undertaken by Amec Foster Wheeler in Autumn/Winter 2015, informed by the input of Council officers, sustainability specialists and additional contributions from technical experts.

The appraisal of the options for Policy SC8 contained in **Appendix B** to this Addendum was however completed by Council officers.

2.5 Technical Difficulties

The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. Any uncertainties encountered and assumptions made as part of this SA addendum are detailed below.

Uncertainties

- ▶ No uncertainties have been identified which could affect this SA addendum.

Assumptions

- ▶ The revised levels of housing and economic development are consistent with updated needs assessments;
- ▶ It is assumed that the percentage of affordable housing identified in policy HO11 will be delivered (we do note that there are recent changes in government policy that allow for greater discussion with developers on viability which may lower the overall % figure on any single development);
- ▶ It is assumed that current energy mix will continue (and associated carbon emissions will be largely similarly to current), although it is noted that against carbon trajectories provided by DECC this may lead to an overestimate of carbon emissions; and
- ▶ It is assumed that there will be no new technological leaps that will substantially alter current patterns of movement, or activities or significantly reduce environmental effects.



3. Appraisal of Effects

3.1 Introduction

The submitted Draft Core Strategy presents the preferred development option for the District, identifying the quantum of growth to be accommodated in the area to 2030 and the key housing numbers and employment land requirements to meet the level of growth. The preferred spatial development option is a hybrid of the previous spatial options considered, which focuses developments on Previously Developed Land (PDL) and economic growth regeneration areas in the Regional City, as well some new housing in the principal towns, local growth centres and local service centres. It reflects the outcome of earlier consultation and responses to the SA findings.

As highlighted above, the EiP of the Draft Core Strategy commenced earlier this year and has resulted in a number of changes to the Core Strategy and in particular the Core Strategy policies. This section summarises the findings of the appraisal of these policies (**Section 3.2**).

3.2 Policy Appraisal

Table 3.1 presents the 17 policies where modifications are proposed. Of the 17 Core Strategy policies affected by the proposed modifications, a total of 4 policies have been significantly redrafted to be considered 'new' policies, whilst 13 policies have been amended, 6 of which have had housing numbers reduced. For these 13 policies some of the proposed main modifications are 'minor' amendments to provide clarification following the EiP. These minor amendments, along with the Sustainability Appraisal (SA) of the Publication Draft Core Strategy version of the policy have been reviewed to determine whether the SA is still appropriate and identifies all relevant sustainability effects. It has been concluded that for 4 policies, the minor amendments have not changed the findings of the previous appraisals, and as such, these 4 policies have not been re-appraised as part of this addendum as the previous SA remains an appropriate description of the likely significant effects of the policy. These are identified in **Table 3.1** as not requiring reappraisal.

Table 3.1 Proposed Main Modifications to Core Strategy Policies

Policy	Summary of Amendment	SA Re-appraisal Required?
Strategic Policies		
SC3 – Working Together	Minor policy wording amendments to provide clarification on the application of the policy.	No.
SC4 – Hierarch of Settlements	Addition of Burley in Wharfedale and Menston as Local Growth Centres to reflect the revised HRA and related increased housing targets for Burley and Menston.	Yes.
SC7 – Green Belt	Amended policy wording to Criterion B to provide clarity on exceptional circumstances which support the need to review the green belt as part of the Local Plan in accordance with paragraph 82 of the NPPF.	Yes.
SC8 – Protecting the South Pennine Moors and the South Pennine Moors SAC and their zone of influence	Policy was redrafted as a result of a process initiated by the Inspector as part of the examination and agreed with Natural England.	Yes
Sub Area Policies		
BD1 – The Regional City of Bradford including Shipley and Lower Baildon	Housing numbers for the Bradford City sub area reduced as a consequence of the main modification to Policy HO3 to housing distribution.	Yes

Policy	Summary of Amendment	SA Re-appraisal Required?
AD1 - Airedale	Housing numbers for the Airedale sub area increased slightly as a consequence of the main modification to Policy HO3 to housing distribution.	Yes
WD1 - Wharfedale	Housing numbers for the Wharfedale sub area increased significantly as a consequence of the main modification to Policy HO3 to housing distribution. This in part reflects the change in status of Burley in Wharfedale and Menston to Local Growth Centres.	Yes
PN1 – South Pennine Towns and Villages	Housing numbers for the South Pennine Towns and Villages sub area reduced slightly as a consequence of the main modification to Policy HO3 to housing distribution.	Yes
Thematic Policies: Economy and Jobs		
EC1- Creating a successful and competitive Bradford District economy within the Leeds City region	Additional policy wording to provide reference to the meaning or application of the term 'Economic Growth Area'.	No
EC2 – Supporting Business and Job Creation	Annual new jobs target reduced to provide a clear indication of realistic and deliverable projected jobs growth rather than an aspirational target.	Yes
Thematic Policies: Housing		
HO3 – Distribution of Housing Development	Amended policy wording to ensure consistency with Policy HO1. Amended apportionment percentages to give greater precision and amended settlement targets to reflect changes to individual settlement apportionments notably Burley in Wharfedale, Menston and Shipley.	Yes
HO4 – Phasing the Release of Housing Sites	Two additional policy criteria to ensure delivery of required housing quantum's and ensure the plan is adaptable and responsive to any future scenario, however unlikely, where there is an insufficient supply of deliverable sites. The policy is also amended to remove the Canal Road Corridor and Bradford City Centre DPD's from the phasing approach. This change ensures a larger supply of land in those areas is released at the start of the plan period to support housing delivery and support their regeneration.	Yes
HO9 – Housing Quality	Minor policy wording amendments to ensure policy is consistent with latest National Planning Policy with regards to national housing standards.	No
HO11 – Affordable Housing	Minor policy wording amendments to ensure policy is consistent with latest National Planning Policy with regards to affordable housing thresholds	No

Policy	Summary of Amendment	SA Re-appraisal Required?
HO12 – Sites for Travellers and Travelling Showpeople	Amended targets for the provision of pitches and plots informed by an updated Gypsy & Traveller Accommodation Assessment. The target for pitches for Gypsies and Travellers is reduced slightly and the target for plots for travelling showpeople is increased slightly. Amended policy wording to: make clear the need to work closely with the community, in particular representatives of the traveller community; and ensure consistency with Policy HO3 by indicating provision is a minimum.	Yes
Thematic Policies: Environment		
EN2 – Biodiversity and Geodiversity	Addition of new policy criteria specifically addressing Sites of Special Scientific Interest to provide clarification and in response to representations from Natural England. Minor policy wording amendments to provide clarification and ensure clarity of the policy in response to issues raised during the Examination process.	Yes
Thematic Policies: Waste		
WM1 – Waste Management	Policy amended to enhance the strategic framework and spatial direction for the Waste Management DPD.	Yes

For those policy changes where SA has been required, the affected policies have been reappraised against the SA objectives. A summary of these policy reappraisals is set out in **Table 3.2** below. The detailed assessment matrices are set out in **Appendix A**, whilst a brief summary of the reappraised policies by subject area is set out in **section 3.2** below.

Table 3.2 Summary of SA Appraisal of Revised and Amended Proposed Modification Core Strategy Policies

SA Objectives	Policy SC4	Policy SC7	Policy SC8	Policy BD1	Policy AD1	Policy WD1	Policy PN1	Policy EC2	Policy HO3	Policy HO4	Policy HO12	Policy EN2	Policy WM1
1. Ensure the prudent and efficient use of natural resources	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	++
3. Reduce the district's impact on climate change and vulnerability to its effects	+	?	0	+ / ?	++	?	+	0	++	0	0	0	+
4. Safeguard and improve air, water and soil resources	?	+/?	?	++ / ? / -	?	? / +	? / -	+/?	--	0	+	++	+
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	+ / -	?	++	++	++	+	++	?	? / +/-	+	+	++	0
6. Maintain and enhance the character of natural and man-made landscapes	+ / -	-	+	-	-	-	-	?	?	+	+	++	0
7. Protect and enhance historic assets and their settings	?	?	?/0	++	++	++	+	?	?	0	0	0	0
8. Provide the opportunity for everyone to live in quality housing which reflects individual's needs, preferences and resources	+	+	?/+	++	++	++	+	++	++	++	++	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
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	+	+	0	+	+ / ?	? / ++	++	++	++	0	0	0	0
11. Improve the quality of the built environment and make efficient use of land and buildings	+ / -	+/-	0	- / ++	- / ++	- / ++	++ / -	++	? / -	++	+	0	0
12. Improve the quality and range of services available within communities and connections to wider networks	+	0	0	++ / ?	+ / ?	? / +	+	0	0	0	0	0	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	+	0	0	++	++	++	+	?	+	0	++	0	0

SA Objectives	Policy SC4	Policy SC7	Policy SC8	Policy BD1	Policy AD1	Policy WD1	Policy PN1	Policy EC2	Policy HO3	Policy HO4	Policy HO12	Policy EN2	Policy WM1
14. Create good cultural, leisure and recreation activities available to all	+	?	+	++ / ?	+	+	+	0	0	0	0	0	0
15. Improve safety and security for people and property	+	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
17. Promote education and training opportunities which build the skills and capacity of the population	+	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
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	+	+	0	++	++	+	?	++	0	0	0	0	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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Strategic Policies

Only the reappraisal of Policy SC8, which seeks to protect the South Pennine Moors (designated as both a SPA and SAC), has resulted in a change to the assessment of that policy against the SA objectives, notably SA objective 7 (cultural heritage). The policy enables a financial contribution to be made towards the provision and management of additional natural greenspace, which could help to deflect the pressures of increased recreation on heritage assets and their settings, as a result of new development. No effects are anticipated. Nevertheless, it is considered that the impact of the policy is either uncertain or neutral at best.

The assessment of Policies SC4 and SC7 in relation to hierarchy of settlements and green belt respectively, have remained unchanged despite the modifications made to these policies. Policy SC4 reflects the change in status of Burley in Wharfedale and Menston to Local Growth Centres. The changes to Policy SC7 provide clarity on exceptional circumstances which support the need to review the green belt in accordance with the NPPF.

Policy SC4

Concentrating development in the Regional City has a number of environmental, social and economic benefits; in particular it primarily focuses development on PDL and regeneration areas with established sustainable transport corridors, and contributes positively towards the sustainable economic growth of the City. The preference for using PDL in the Regional City would, to some extent, lessen the effects associated with the need to accommodate a significant amount of development within the green belt (26.1¹⁸% of housing through the release green belt land and spread across most settlements across the district), by focusing the majority of the proposed development in areas where there is the least potential for impacts on biodiversity and landscape. This policy is therefore considered to contribute both positively and negatively to SA objectives 5 and 6.

Focusing development primarily in the Regional City and Principal Towns could affect the viability of the other towns, villages and rural areas in the District, particularly given that there are some deficiencies in housing and services provision and accessibility is an issue, with public transport provision limited in some areas. The policy seeks to address these issues through provision of housing, employment, and services/facilities where there is a need and improvements to public transport links and accessibility to enhance the vitality and viability of these areas. The inclusion of Burley in Wharfedale and Menston as Local Growth Centres within the settlement hierarchy, due to their sustainable nature as locations for some growth, seeks to ensure a spatial strategy for the location of development most appropriate for the District.

The policy is also considered to contribute positively to some of the social SA objectives, for example SA objectives 8 and 9, relating to provision of housing and increasing transport choice respectively, since the policy stipulates that plans, strategies and programmes should 'achieve a wide range of housing' and 'improve public transport systems'.

Each of the priorities outlined in this policy seek to ensure sustainable growth whilst protecting and enhancing the environment and quality of life and therefore contribute positively to at least one of the SA objectives.

Sub Area Policies

A number of the sub area policies, notably Policies BD1, AD1, and PN1, have all had the housing numbers contained within them changed, i.e. the housing numbers for some of the sub areas have been reduced. The numbers have been amended as a consequence of the modification made to housing distribution set out in Policy HO3. Despite this reduction in housing numbers in some sub areas, which in itself would imply that less land would need to be made available to accommodate the local housing needs, the overall essence of each of these sub-area policies remains unchanged. As such, it is considered that the appraisal of these policies against the SA objectives is unchanged.

¹⁸ The draft Core Strategy estimates a need to release green belt land with an approx capacity for 11,000 units across the district as a whole in order to meet the overall target of 42,100 new homes. This would therefore equate to 26.1% of the district wide total.

It is also noted that in Part C of BD1, the following text is inserted “...*The new homes will be delivered by a mix of sites but will include some local green belt changes in sustainable locations. The location and design of development will have regard to the requirement within Policy EN3 conserve those elements which contribute to the Outstanding Universal Value of Saltaire.*” The reference to local green belt changes echoes comments in criterion 1 for South East Bradford in BD1 and foreshadows loss of some further greenfield land and in relation to Saltaire, reflects comments received from English Heritage. Whilst it is recognised that this is a material change in the policy, it does not materially affect the appraisal.

For policy WD1 housing numbers are increasing (from 1,600 to 2,500) and so this policy has been re-appraised in light of this increase. These additional homes are apportioned across a number of additional settlements inserted into the policy (which have been now identified in the settlement hierarchy as local growth centres in amendments to Policies SC1 and SC4). Amendments to criterion B in the policy include the following text “*Burley in Wharfedale will see creation of 700 new homes through redevelopment of sites within the settlement and with a significant contribution from green belt changes, together with associated community facilities*”. The significant contribution of green belt land is now recognised and the impact of this is reflected in the policy assessment against the SA objectives that include soil quality and land use, though this does not change the overall assessment.

Thematic Policies

Economy and Jobs

The proposed modifications to Policy EC2 ‘Supporting Business and Job Creation’, sees the jobs growth figure within the policy reduced in line with the projections of the Yorkshire and Humber Regional Econometric Model (REM). The previous figure was an aspirational one but it has been recognised by the Council that the jobs projections must be deliverable and must be consistent with the jobs growth assumptions embedded within the Council’s assessment of housing need. This also aligns with other Local Plans in the Leeds City Region (LCR) as well as the LCR Strategic Economic Plan which use REM figures. The reduction in this jobs number has not resulted in or necessitated any changes to other policies such as the amount of employment land releases proposed or key regeneration areas or priorities. Thus although the jobs creation target for the district may be less than previously stated, the overall assessment of the policy against the SA objectives has remained unchanged and is still a significant positive as the support to business and job creation, remains unaltered.

A reduced annual jobs outturn would also provide less employment opportunities to the people of Bradford and so the extent of any positive benefit (with regard to well-being, social cohesion and the access to services) would be lessened. However it is considered that the overall scale of the increase in job numbers will still have positive impacts and so as noted above the overall assessment remains unchanged.

Housing Policies

It is considered that the reassessment of the three housing policies (Policies HO3, HO4, and HO9) against the SA objectives have remained unchanged as a result of the Proposed Modifications. Overall, the housing requirement figure for the District as set out in Policy HO3 has remained unchanged, only the distribution of the figure across the difference principal towns and local growth centres has been amended following the inclusion of Burley in Wharfedale and Menston as Local Growth Centres. As such, the principle of those reassessed housing policies, notably Policy HO3, has remained unchanged and therefore their assessment against the SA objectives is similarly unaffected. With regards to policy HO12, as the proposed policy modification is in response to a revised gypsy and traveller needs assessment which has resulted in setting a slightly lower pitch target for gypsy and travellers and a slightly higher target for showpeople, this is overall considered to be a sufficiently minor change that the assessment of this policy remains unchanged.

Environment Policies

The proposed modifications to Policy EN2 ‘Biodiversity and Geodiversity’ has resulted in the addition of a new criterion in relation to Sites of Special Scientific Interest (SSSIs). This addition has sought to strengthen the policy in providing environmental protection notably in relation to SA objective 5 (biodiversity). Nevertheless, there has been no change to the overall assessment as a result of the reappraisal of the policy

in that Policy EN2 was considered to already have a significantly positive impact on the relevant SA objectives.

Waste Policies

The reassessment of Policy WM1 against the SA objectives has remained unchanged as a result of the Proposed Modifications in that the principle of the policy has remained unchanged.

Consideration of Alternatives for Policy SC8

Following the EiP hearings for the draft Core Strategy, the Inspector continued to identify guidance and decision making that could exercise an influence on the plan. One such item was the Court of Appeal Judgement¹⁹ of July 2015 regarding Wealden District Council's Core Strategy Local Plan Policy WCS12 (Biodiversity).

The Court of Appeal Judgement regarding Wealden District relates to an approach to the identification and delivery of mitigation measures based on 'zones of influence', in relation to residential development in zones surrounding a European Site, in this case Ashdown Forest. Wealden Council's Policy identifies an outer zone which has the aim of ensuring that the European Site, (also an SPA and SAC), is protected from recreational pressures.

The draft Core Strategy Policy SC8 includes a comparable approach to the avoidance of any likely significant effects and adverse effect on integrity on the South Pennine Moors SPA and SAC by using zones of influence to manage development and recreational pressure. The proposed policy SC8 also includes mitigation and compensatory measures.

The development of the policy involved the Council considering and reviewing alternative approaches. These included considering whether there were alternative distances available if the zone of influence approach was to be used, as well as considering whether an alternative based on a project by project consideration of any likely significant effects (and adverse effects on integrity) on the European sites would be more appropriate. A review of evidence suggested that the proposed zones of influence were the most appropriate for the European sites within the district. The project by project approach was however taken forward for appraisal along with the Council's revised policy SC8. Further information about the alternatives considered and appraised can be found at **Appendix B**.

In summary, the appraisal concluded that the approach using the zones of influence set out in the proposed Policy SC8 would achieve more effective mitigation and the necessary degree of certainty to be able to conclude that the Core Strategy would not result in adverse impacts on the ecological integrity of the South Pennine Moors SPA and SAC.

3.3 Cumulative Effects of Proposed Policy Changes

The cumulative impacts of the proposed policy changes to the Draft Core Strategy have also been considered. Whilst it is acknowledged that the reduction in overall job numbers is a significant change to the Draft Core Strategy aspirations, it is not considered that this results in any changes to the previous cumulative assessment presented in Table 5.3.5 in the 2014 SA Report of the economic policies, given that there will still be an overall net positive cumulative impact from an increase in jobs across Bradford.

The changes in housing numbers are considered to be sufficiently minor that there is no change to previous cumulative assessment in the 2014 SA Report.

The other changes to Draft Core Strategy policies are considered to be sufficiently minor that there are no net changes identified from the previous cumulative policy assessment.

¹⁹ Further information about the Court of Appeal Judgement can be found here:

http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/CoreStrategy/Planning_Core_Strategy_Local_Plan.aspx

4. Conclusion and Next Steps

4.1 Conclusion

Overall the reassessments of those policies which have either been significant redrafted or amended against the SA objectives have not been changed as a result of the Proposed Modifications. This is because the overall principle of those policies has not been altered. Nevertheless, where policies have been amended – notably those where housing numbers and employment targets have been reduced – the new figures in these policies are considered to have potential effects on a number of the SA objectives in comparison with how the policy was originally drafted.

Although the actual numbers for housing in some locations and/or jobs have been reduced these changes are not considered sufficient to change the overall assessment of these policies against the SA objectives, in that there is still a net gain.

The exceptional circumstances for green belt release leading to land being brought forward for housing that is currently identified as being in more sustainable locations and land for employment being in marketable locations is still considered overall to be consistent with the overall approach to the location of development in the Core Strategy (as set out in Policy SC5) and the requirement in Policy H06 to maximise the use of PDL.

Mitigation Measures

Following assessment of the revised policies and changes to the Draft Core Strategy some new mitigation measures are recommended for further consideration, which are listed in **Table 4.1** below.

Table 4.1 Suggested Policy Mitigation Measures

Policy	Proposed Mitigation
SC4	<p>A number of recommendations are made, including:</p> <ul style="list-style-type: none"> ▶ Improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services/facilities and employment elsewhere. ▶ In addition to enhancing biodiversity and recreation, the value of existing green areas as functional floodplain is recognised and protected. <p>A similar design priority as that for the Regional City, Local Service Centres and Rural Areas could be adopted for the other settlements.</p>
SC7	<p>The final sentence in new paragraph 3.102 (in MM16) states <i>'To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.'</i> However, the text does not state that the sites are in sustainable locations, merely that they are in good market locations. To ensure that such sites are in sustainable locations, the wording should be amended to state sustainable locations. This would then permit consideration of access and environmental impacts etc...</p>
EC2	<p>It is recommended either within wording of the policy itself or in the supporting text that explains the reasoning behind the 1,600 jobs as this figure is above the REM forecast and the historical trend for Bradford. It is recognised that the 1,600 figure is more aligned with the REM figure but this reference should be made explicit.</p> <p>It is also recommended that the phrase <i>'marketable locations'</i> for employment land is replaced with <i>'sustainable locations'</i> in order to ensure that consideration can then be given to environmental factors</p>

For the avoidance of doubt, the above table does re-iterate suggested mitigation measures detailed in Table 6.1 of the 2014 Publication Draft Core Strategy SA Report. The proposed mitigation measures identified above should be read alongside those from Table 6.1 as it is considered that these previous mitigation measures outlined in the 2014 report are still applicable.

Monitoring Measures

Following review of the proposed main modifications to the Draft Core Strategy it is considered that the monitoring measures proposed in the 2014 Core Strategy SA Report (Table 6.2) remain appropriate and should continue to be used to monitor the effects of the Core Strategy once adopted.

4.2 Next Steps

This addendum to the SA Report is being published for consultation alongside the Council's proposed main modifications to the Core Strategy. We would welcome your views on any aspect of this addendum. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

The consultation will run from 25th November 2015 to 20th January 2016.

Representations must be made in writing and are strongly encouraged to be submitted electronically on the official Representation Form which can be found on line at:

<http://www.planning-inspectorate.gov.uk>.

Representations may be submitted electronically via E-mail to: planning.policy@bradford.gov.uk or by post to:

Local Plan Group

City of Bradford Metropolitan District Council

2nd Floor South Jacobs Well

Nelson Street

Bradford

BD1 5RW



Appendix A

Policy Appraisal Matrices



Strategic Core Policy 4 (SC4) Hierarchy of Settlements

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	The policy will not directly affect energy and resource efficiency as such impacts on this objective are considered neutral.	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	The policy will not directly affect waste growth as such impacts on this objective are considered neutral.	0
3. Reduce the district's impact on climate change and vulnerability to its effects	<p>New housing and employment in Bradford city centre, Keighley, Ilkley and Bingley is likely to be well located in relation to public transport, the cycle network and services / facilities and employment. Local Growth Centres have also been identified by considering accessibility by public transport, whilst development in Local Service Centres will be to meet local need. These aspects should reduce the need to travel by car for short journeys and encourage use of more sustainable modes of transport, and thus could help to reduce greenhouse gas emissions from car travel - exhaust emissions. The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. This will help to reduce reliance on the car, and in turn reduce greenhouse gas emissions and have a minor positive impact on this objective.</p> <p>It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services/facilities and employment elsewhere.</p>	+

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
4. Safeguard and improve air, water and soil resources	<p>New housing and employment in Bradford city centre, Keighley, Ilkley and Bingley is likely to be well located in relation to public transport, the cycle network and services / facilities and employment. Local Growth Centres have also been identified by considering accessibility by public transport, whilst development in Local Service Centres will be to meet local need. These aspects should reduce the need to travel by car for short journeys and encourage use of more sustainable modes of transport, and thus could help to improve air quality. The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford Corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. This will help to reduce reliance on the car, and in turn improve air quality and have a minor positive impact on this objective.</p> <p>It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services / facilities and employment elsewhere.</p> <p>There is the potential for new housing in all locations except Queensbury and Oakworth to have an effect upon water quality and flood risk and as such results in an uncertain impact of this policy on the SA objective. It is recommended that, in addition to enhancing biodiversity and recreation, the value of existing green areas as functional floodplain is recognised and protected.</p>	?
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>There are several Bradford Wildlife Areas, ancient woodland, and / or SEGIs within and / or in the area surrounding the settlements. However, the policy seeks to create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity which will have a significant positive impact on this objective.</p> <p>Proposed Modifications to Policy SC7 states, "housing requirements under Policy HO1 in full would necessitate change to green belt to accommodate around 11,000 dwellings, given land supply constraints in non green belt land". As such, some 39% of housing (i.e. 11,000 of the proposed 27,750 houses, will need to be accommodated on land in the green belt. Although the preference, as set out in Policy SC5, is still to use previously developed land (PDL), necessarily constraints meant that some 39% of housing will need to be located on re-designated Green Belt.</p> <p>Overall, it is therefore considered that the policy could potentially have both a negative and positive impact on this objective – a positive impact where housing can be accommodated on preferred PDL and a negative impact where this would require the release of green belt land.</p>	+ / -

KEY	- -	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
6. Maintain and enhance the character of natural and manmade landscapes	The policy seeks to create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation which would have a positive impact on this objective. In Bradford there will be a high quality public realm with well designed buildings that will help protect and improve the built townscape whilst in the Local Service Centres a high standard of design is required. It is recommended a similar design priority could be adopted for the other settlements. Nevertheless, the potential positive impacts of this policy need to be offset against the need to accommodate some 39% of housing need on land to be released from the green belt, which in itself could potentially have a negative impact on this objective. Overall, therefore it is considered the policy could have both a positive and negative impact on this objective.	+ / -
7. Protect and enhance historic assets and their settings	There is the potential for new housing in all locations to have an effect upon historic assets and this results in an uncertain impact as new development could adversely impact on the historic environment without proper safeguards in place. It is recommended that, in addition to enhancing biodiversity and recreation, the heritage value of existing green areas is recognised and protected whilst within the design priority for all settlements the heritage value of existing buildings should be recognised and protected.	?
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	Concentrating development in Bradford and the Principal Towns focuses development on previously developed land and regeneration areas with established sustainable transport corridors, albeit that some 39% of housing will have to be accommodated through the release of green belt land. Focussing development on Bradford and the Principal Towns could affect the viability of other towns, villages and rural areas given that there are some deficiencies in housing but the policy seeks to address this through provision of housing to meet local needs in Local Growth Centres and Local Service Centres. This will make a positive contribution towards providing good housing choice and make a positive contribution towards this objective.	+

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	<p>New housing and employment in Bradford city centre, Keighley, Ilkley and Bingley is likely to be well located in relation to public transport, the cycle network and services / facilities and employment. Local Growth Centres have also been identified by considering accessibility by public transport, whilst development in Local Service Centres will be to meet local need. These aspects should reduce the need to travel by car for short journeys and encourage use of more sustainable modes of transport. Burley in Wharfedale and Menston have been included as additional local growth centres in that they have been identified for their sustainable nature as locations for some growth.</p> <p>The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. This will help to reduce reliance on the car and have a significant positive impact on this objective. It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services/facilities and employment elsewhere.</p>	++
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	<p>New housing and employment in Bradford city centre, Keighley, Ilkley and Bingley is likely to be well located in relation to public transport, the cycle network and services / facilities and employment. Local Growth Centres have also been identified by considering accessibility by public transport, whilst development in Local Service Centres will be to meet local need. These aspects should reduce the need to travel by car for short journeys and encourage use of more sustainable modes of transport. The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. This will help to reduce reliance on the car and have a positive impact on this objective. It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services/facilities and employment elsewhere.</p>	+

KEY	- -	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
11. Improve the quality of the built environment and make efficient use of land and buildings	<p>The policy seeks to create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation which would have a positive effect on this objective. Concentrating development in Bradford primarily seeks to focus development on previously developed land which will reduce the extent of potential Green Belt releases and focuses development in areas where regeneration is needed. Nevertheless, it is recognised that some 39% of housing will need to be accommodated through the release of green belt land. In Bradford there will be a high quality public realm with well designed buildings that will help protect and improve the built townscape whilst in the Local Service Centres a high standard of design is required. It is recommended a similar design priority could be adopted for the other settlements.</p> <p>The potential positive impacts of this policy need to be offset against the need to accommodate some 39% of housing need on land to be released from the green belt, which in itself could potentially have a negative impact on this objective. Overall, it is therefore considered the policy could have both a positive and negative impact on this objective.</p>	+ / -
12. Improve the quality and range of services available within communities and connections to wider networks	<p>Concentrating development in Bradford and the Principal Towns focuses development on previously developed land and regeneration areas with established sustainable transport corridors and so access to existing services and facilities, albeit that some 39% of housing will have to be accommodated through the release of green belt land. Focussing development on Bradford and the Principal Towns could affect the viability of other towns, villages and rural areas given that there are some deficiencies in services but the policy seeks to address this through provision of services to meet local needs in Local Growth Centres and Local Service Centres. The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services/facilities elsewhere.</p>	+
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	<p>The policy seeks to create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation. Concentrating development in Bradford primarily focuses development on previously developed land which will reduce the extent of potential Green Belt releases and focuses development in areas where regeneration is needed, albeit that some 39% of housing will have to be accommodated through the release of green belt land. In Bradford there will be a high quality public realm with well designed buildings that will help protect and improve the built townscape whilst in the Local Service Centres a high standard of design is required. It is recommended a similar design priority could be adopted for the other settlements.</p>	+

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
14. Create good cultural, leisure and recreation activities available to all	<p>Concentrating development in Bradford and the Principal Towns focuses development primarily on previously developed land and regeneration areas with established sustainable transport corridors and so access to existing leisure and recreational opportunities. It is recognised however, the some 39% of housing will have to be accommodated through the release of green belt land. The policy seeks to create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation. The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. This will make a significant positive contribution towards providing access to leisure and recreational activities. It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres.</p>	+
15. Improve safety and security for people and property	<p>In Bradford there will be a high quality public realm with well designed buildings that will help protect and improve the built townscape whilst in the Local Service Centres a high standard of design is required. It is recommended a similar design priority taking into account "secured by design" could be adopted for the other settlements.</p>	+
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	<p>Concentrating development in Bradford and the Principal Towns focuses development on primarily previously developed land and regeneration areas with established sustainable transport corridors and so access to existing health facilities. It is recognised however, the some 39% of housing will have to be accommodated through the release of green belt land. Focussing development on Bradford and the Principal Towns could affect the viability of other towns, villages and rural areas given that there are some deficiencies in health services but the policy seeks to address this through provision of services to meet local needs in Local Growth Centres and Local Service Centres. The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local health facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access health facilities elsewhere.</p>	+

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
17. Promote education and training opportunities which build the skills and capacity of the population	<p>Concentrating development in Bradford and the Principal Towns focuses development primarily on previously developed land and regeneration areas with established sustainable transport corridors and so access to existing education facilities. It is recognised however, the some 39% of housing will have to be accommodated through the release of green belt land. Focussing development on Bradford and the Principal Towns could affect the viability of other towns, villages and rural areas given that there are some deficiencies in education provision but the policy seeks to address this through provision of services to meet local needs in Local Growth Centres and Local Service Centres.</p> <p>The proposed modifications to the policy see Burley in Wharfedale and Menston included as additional local growth centres due to their sustainable nature as locations for some growth. The inclusion of these settlements as Local Growth Centres will help spread development across the settlement hierarchy in settlements that are more sustainable due to location and composition of services and facilities provided.</p> <p>The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that education provision is limited in some locations, without these improvements residents may therefore have to travel by car to access education.</p>	+

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	<p>Concentrating development in Bradford and the Principal Towns focuses development primarily on previously developed land and regeneration areas with established sustainable transport corridors. It is recognised however, the some 39% of housing will have to be accommodated through the release of green belt land. Focussing development on Bradford (where a wide range of employment will be offered) and the Principal Towns could affect the viability of other towns, villages and rural areas given that there are some deficiencies in employment provision but the policy seeks to address this through support of economic development and in more rural areas home working, live work to meet local needs in Local Growth Centres and Local Service Centres. This will make a positive contribution towards providing good employment opportunities and make a significant positive contribution towards this objective.</p> <p>The proposed modifications to the policy see Burley in Wharfedale and Menston included as additional local growth centres due to their sustainable nature as locations for some growth, thus ensuring a spatial strategy for the location of development most appropriate for the City.</p> <p>The policy seeks to improve public transport systems and increase opportunities for walking and cycling in Bradford and along the Leeds Bradford corridor. Public transport improvements are also promoted in the Principal Towns and Local Growth Centres. It is recommended that improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that employment provision is limited in some locations, without these improvements residents may therefore have to travel by car to access employment.</p>	++
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	<p>Concentrating development in Bradford and the Principal Towns focuses development primarily on previously developed land and regeneration areas with established sustainable transport corridors. It is recognised however, the some 39% of housing will have to be accommodated through the release of green belt land. Focussing development on Bradford (where a wide range of employment will be offered) and the Principal Towns could affect the viability of other towns, villages and rural areas given that there are some deficiencies in employment provision but the policy seeks to address this through support of economic development and in more rural areas home working, live work to meet local needs in Local Growth Centres and Local Service Centres. This will make a positive contribution towards this objective.</p> <p>The proposed modifications to the policy see Burley in Wharfedale and Menston included as additional local growth centres due to their sustainable nature as locations for some growth, thus ensuring a spatial strategy for the location of development most appropriate for the City.</p>	+

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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring

Summary:

Concentrating development in the Regional City has a number of environmental, social and economic benefits; in particular it primarily focuses development on PDL and regeneration areas with established sustainable transport corridors, and contributes positively towards the sustainable economic growth of the City. The preference for using PDL in the Regional City would counteract the identified need to accommodate 39% of housing through the release green belt land, which is likely to have a number of environmental impacts, and focuses development in areas where there is the least potential for impacts on biodiversity and the landscape. This policy is therefore considered to contribute both positively and negatively to SA objectives 5 and 6.

Focusing development primarily in the Regional City and Principal Towns could affect the viability of the other towns, villages and rural areas in the District, particularly given that there are some deficiencies in housing and services provision and accessibility is an issue, with public transport provision limited in some areas. The policy seeks to address these issues through provision of housing, employment, and services/facilities where there is a need and improvements to public transport links and accessibility to enhance the vitality and viability of these areas. The inclusion of Burley in Wharfedale and Menston as Local Growth Centres within the settlement hierarchy, due to their sustainable nature as locations for some growth, seeks to ensure a spatial strategy for the location of development most appropriate for the City.

The policy is also considered to contribute positively to some of the social SA objectives, for example SA objectives 8 and 9, relating to provision of housing and increasing transport choice respectively, since the policy stipulates that plans, strategies and programmes should 'achieve a wide range of housing' and 'improve public transport systems'.

Each of the priorities outlined in this policy seek to ensure sustainable growth whilst protecting and enhancing the environment and quality of life and therefore contribute positively to at least one of the SA objectives.

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SA Objectives	Policy SC4 Hierarchy of Settlements	
	Commentary	Scoring
<p>Mitigation:</p> <p>A number of recommendations are made, including:</p> <ul style="list-style-type: none"> Improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services/facilities and employment elsewhere. In addition to enhancing biodiversity and recreation, the value of existing green areas as functional floodplain is recognised and protected. <p>A similar design priority as that for the Regional City, Local Service Centres and Rural Areas could be adopted for the other settlements.</p>		

Strategic Core Policy 7 (SC7) Green Belt

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SA Objectives	Policy SC7 Green Belt	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	The policy will not directly affect energy and resource efficiency as such impacts on this objective are considered neutral.	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	The policy will not directly affect waste growth as such impacts on this objective are considered neutral.	0
3. Reduce the district's impact on climate change and vulnerability to its effects	Other than those strategic locations which have been identified within the Green Belt which cannot otherwise be accommodated on non green belt land, environmental resources within the Green Belt (e.g. woodland, floodplain etc.) will be protected, and greenfield land will be used as a last priority for development. The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel, e.g. exhaust emissions. As such, the overall impacts on this objective are considered uncertain.	?
4. Safeguard and improve air, water and soil resources	<p>Green Belt land could include floodplain and woodland, but if in accordance with the other strategic core policies these environmental resources will be protected, and greenfield land will be used as a last priority for development. The policy however identifies 3 strategic locations within the Green Belt which represent more sustainable locations which are not available in non green belt locations. As such, the policy would have a negative impact on this objective through the loss of green belt land.</p> <p>The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel, e.g. exhaust emissions.</p> <p>The remainder of the Green Belt will be protected for at least 15 years from adoption; this will help to prevent further loss of green field/agricultural land and help to safeguard air, water and soil resources and would therefore have a positive impact on this objective.</p> <p>Overall, it is considered that this policy will have a mixed positive and negative effect against this objective.</p>	+ / -

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SA Objectives	Policy SC7 Green Belt	
	Commentary	Scoring
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>Green Belt land could support habitats and support species of value but if in accordance with the other strategic core policies these biodiversity resources will be protected, although brownfield land could be equally as valuable as a biodiversity resource. The policy however identifies 3 strategic locations within the Green Belt which represent more sustainable locations which are not available in non green belt locations. As such, the policy would have a negative impact on this objective through the loss of green belt land.</p> <p>The remainder of the Green Belt will be protected for at least 15 years from adoption; this will help to prevent further loss of green field/agricultural land and help to protect wildlife species and habitats and would therefore have a positive impact on this objective.</p> <p>Overall, it is considered that this policy will have a mixed positive and negative effect against this objective.</p>	+ / -
6. Maintain and enhance the character of natural and man-made landscapes	<p>Although it is unavoidable due to the requirement for Green Belt releases to allow for new housing and employment development, because the policy sets out the need for localised reviews of the Green Belt to allow for development the policy scores negatively against this objective. There will therefore be a negative effect upon this objective. However, the scale of negative effect is uncertain at this stage but could be significantly negative when the scale of the release known.</p> <p>The remainder of the Green Belt will be protected for at least 15 years from adoption; this will help to prevent further loss to development.</p>	--/?
7. Protect and enhance historic assets and their settings	<p>Loss of Green Belt land could have an effect upon cultural, historic and archaeological assets and their settings but if in accordance with the other strategic core policies these heritage resources will be protected and greenfield land will be used as a last priority for development, although the redevelopment of brownfield land could equally impact on historic assets.</p> <p>The remainder of the Green Belt will be protected for at least 15 years from adoption; this will help to prevent further loss of green field land and help to protect historic assets.</p> <p>As such, the overall impacts on this objective are considered uncertain.</p>	?
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	<p>The selective Green Belt reviews will be necessary to allow the proposed housing growth to be delivered in sustainable locations to meet local needs. As such, the policy contributes positively towards this objective.</p>	++

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SA Objectives	Policy SC7 Green Belt	
	Commentary	Scoring
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport. However, the policy will not directly affect transport choice or the transport network as such impacts on this objective are considered to be neutral.	0
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport. As such, this policy contributes positively towards this objective.	+
11. Improve the quality of the built environment and make efficient use of land and buildings	The policy sets out the valuable role of the Green Belt in supporting urban renaissance and transformation. Green Belt land is proposed for development as it is considered to provide more sustainable locations which are not available in non Green Belt locations. The remainder of the Green Belt will be protected for at least 15 years from adoption; this will help to prevent further loss of green field land and would in this respect have a positive impact upon this objective.	+
	Notwithstanding the above positive impacts, the policy does allow for green belt releases, albeit on a selective basis, which would have negative impacts. The scale of the Green Belt changes means that there is potential for significant negative effects upon this objective.	-
12. Improve the quality and range of services available within communities and connections to wider networks	The localised Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport. However, the policy will not directly affect access to services or transport connections as such impacts on this objective are considered to be neutral.	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport. However, the policy will not directly affect access to services or transport connections as such impacts on this objective are considered to be neutral.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC7 Green Belt	
	Commentary	Scoring
14. Create good cultural, leisure and recreation activities available to all	<p>Green Belt land could include land used for recreation, but if in accordance with the other strategic core policies recreational opportunities will be maintained.</p> <p>The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to provide better access to leisure activities.</p> <p>The remainder of the Green Belt will be protected for at least 15 years from adoption; this will help to prevent further loss of greenfield land that could be used for recreation.</p> <p>As such, the overall impacts on this objective are considered to be uncertain.</p>	?
15. Improve safety and security for people and property	<p>Selective Green Belt reviews will be necessary to allow the proposed housing and job growth to be delivered.</p> <p>However, the policy itself will not directly increase safety and security as such impacts on this objective are considered to be neutral.</p>	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	<p>The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport. However, the policy itself will not directly increase health and well-being as such impacts on this objective are considered to be neutral.</p>	0
17. Promote education and training opportunities which build the skills and capacity of the population	<p>The selective Green Belt reviews are required to deliver housing and employment opportunities in sustainable locations to help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport. However, the policy itself will not directly increase education and training opportunities as such impacts on this objective are considered to be neutral.</p>	0
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	<p>Selective Green Belt reviews will be necessary to allow the proposed job growth to be delivered. This may indirectly increase job opportunities by providing the right conditions, including sites, premises and infrastructure to encourage sustainable investment and enterprise in sustainable locations. Given that potentially 62% of employment land (84ha of 135ha) will be located on former Green Belt it is considered that the policy will have significant positive impacts upon this objective.</p>	++

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC7 Green Belt	
	Commentary	Scoring
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	Selective Green Belt reviews will be necessary to allow the proposed job growth to be delivered; enabling release of Green Belt may help to provide the right conditions, including sites, premises and infrastructure to encourage sustainable investment and enterprise. As such, the policy is considered to contribute positively towards this objective.	+
<p>Summary:</p> <p>Para 83 of the National Planning Policy Framework (NPPF) states that “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” The proposed policy amendments establish the exceptional circumstances under which green belt releases will be required to allow for new development. Based on the SHLAA, meeting the housing requirement of policy HO1 in full would necessitate change to green belt to accommodate around 11,000 dwellings, given land supply constraints in non green belt land. Based on the ELR, there is limited mix of land of the right size and locations, necessitating changes to the green belt. The green belt review will aim to make available sites in more sustainable locations. The policy also sets out the need for localised reviews of the green belt to allow for development and as such this policy scores negatively against SA objective 6 relating to landscape. Nevertheless, it is considered that the policy contributes positively to a number of SA objectives, including SA objective 8 relating to housing, SA objective 10 relating to need to travel, SA objective 11 relating to use of land, SA objective 18 relating to employment, and SA objective 19 relating to investment and enterprise.</p>		
<p>Mitigation:</p> <p>The final sentence in new paragraph 3.102 (in MM16) states <i>‘To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.’</i> However, the text does not state that the sites are in sustainable locations, merely that they are in good market locations. To ensure that such sites are in sustainable locations, the wording should be amended to state sustainable locations. This would then permit consideration of access and environmental impacts etc...</p>		

Strategic Core Policy 8 (SC8) Protecting the South Pennine Moors and Their Zone of Influence

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC8 Protecting the South Pennine Moors and the South Pennine Moors SAC and Their Zone of Influence	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	No effects are anticipated.	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	No effects are anticipated.	0
3. Reduce the district's impact on climate change and vulnerability to its effects	The policy will not permit development where it would be likely to lead, directly or indirectly, to an adverse effect upon the integrity on the South Pennine Moors SPA or SAC; and accordingly identifies a number of zones in which the level of development permitted is restricted. The contribution towards the provision, management and maintenance of accessible greenspace, could help to offset any carbon dioxide emissions from new development in Zone C. Overall, it is considered that the policy will not directly affect climate change and impacts on this objective are therefore considered to be neutral.	0
4. Safeguard and improve air, water and soil resources	The policy will not permit development where it would be likely to lead, directly or indirectly, to an adverse effect upon the integrity on the South Pennine Moors SPA or SAC; In mitigating the impact of increased recreational pressure from development within the zone of influence, the policy should have a marginally positive impact on the peat soil resource and avoidance of erosion within the SPA and SAC.	+/?
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>The policy is specifically aimed at avoiding any potential adverse impacts on the South Pennine Moors SPA and SAC and has been developed specifically to address the impact pathways identified in the HRA. The policy sets out a strategic approach to avoidance and mitigation measures. In avoiding multiple urban edge effects in close proximity to the site, supporting land used by SPA birds for foraging and advocating a strategic approach to mitigating recreational impacts the policy would have a strongly positive impact on conserving and enhancing the European site. A coordinated approach will better address the impacts of increases in recreational pressure and makes provision of additional natural greenspace more likely as a form of mitigation, which could contribute to the provision of species rich habitat.</p> <p>Notwithstanding that there could potentially be a release of some land for development; it is considered that overall aims of the policy will have significant positive impacts on this objective.</p>	++

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC8 Protecting the South Pennine Moors and the South Pennine Moors SAC and Their Zone of Influence	
	Commentary	Scoring
6. Maintain and enhance the character of natural and man-made landscapes	<p>The policy is specifically aimed at minimising the potential impacts on the South Pennine Moors SPA and SAC and as such could contribute towards this objective, since it will help to maintain the character of the landscape within SPA and SAC. Nevertheless, this needs to be offset against the fact that the policy allows for the potential release of some land in Zones B and C. Nevertheless, a financial contribution towards the provision and management of additional natural greenspace as mitigation, would contribute positively to maintaining and enhancing natural landscape features. .</p> <p>Overall, it is considered that overall this policy would make a minor positive towards this objective.</p>	+
7. Protect and enhance historic assets and their settings	<p>A financial contribution towards the provision and management of additional natural greenspace, could help to deflect the pressures of increased recreation on heritage assets and their settings, as a result of new development. Reference is also made to the developer offers, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace Notwithstanding this, it is considered that the impact of the policy is either uncertain or neutral at best.</p>	?/0
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	<p>The approach in Policy SC8 provides greater clarity and consistency for developers and other stakeholders and identifies issues at a relatively early stage. It identifies the geographic area within which mitigation is required and gives an indication of the nature of mitigation. In relation to recreational pressure the policy allows for a range of mitigation measures. While a degree of uncertainty exists in relation to implementation, a minor positive impact is identified.</p>	?/+
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	No effects are anticipated.	0
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	No effects are anticipated.	0
11. Improve the quality of the built environment and make efficient use of land and buildings	No effects are anticipated.	0
12. Improve the quality and range of services available within communities and connections to wider networks	No effects are anticipated.	0

KEY	- -	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC8 Protecting the South Pennine Moors and the South Pennine Moors SAC and Their Zone of Influence	
	Commentary	Scoring
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	No effects are anticipated.	0
14. Create good cultural, leisure and recreation activities available to all	A financial contributions towards the provision and management of natural greenspace could facilitate access to, and participation in, countryside recreation. Reference is also made to the developer offers, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace which would further help to have positive impacts upon this objective. As such, it is considered that the policy will contribute positively to this objective.	+
15. Improve safety and security for people and property	No effects are anticipated.	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	No effects are anticipated.	0
17. Promote education and training opportunities which build the skills and capacity of the population	No effects are anticipated.	0
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	No effects are anticipated.	0
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	No effects are anticipated.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy SC8 Protecting the South Pennine Moors and the South Pennine Moors SAC and Their Zone of Influence	
	Commentary	Scoring
<p>Summary:</p> <p>This policy is specifically aimed at avoiding any potential direct or indirect effects on the South Pennine Moors SPA and SAC and consequently contributes significantly positively to SA objective 5.</p> <p>The policy allows for the potential release of some land in the identified zones of influence albeit subject to conditions and thereby contributes positively to SA objectives 6 and 14 in relation to landscape and leisure and recreation.</p>		
<p>Mitigation:</p> <p>None.</p>		

Policy BD1 City of Bradford including Shipley and Lower Baildon Sub Area

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	<p>Policy seeks to use the opportunities provided by increased development to maximise renewable energy generation and energy efficiency, including neighbourhood CHP that will make a significant positive contribution towards this objective.</p> <p>However, the opportunities for renewable energy in the Sub Regional City area may be limited due to its developed nature and so overall impacts upon this objective are marginal.</p>	+
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	<p>The new housing and employment land proposed in this policy will result in significant new development and as a result will generate waste. There is no specific mention of waste or measures to minimise waste generation although it would be in accordance with policy WM1 elsewhere in the Core Strategy. However, new housing development in the Sub Regional City should be able to access existing recycling facilities and kerbside recycling collection services of two or more recyclables would be feasible. On this basis there would be a minor positive impact on this objective.</p> <p>Reference could be made under Environment section of the policy to promote waste minimisation and encouraging recycling within the City of Bradford in order to increase the sustainability of this policy option.</p>	+

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
3. Reduce the district's impact on climate change and vulnerability to its effects	<p>The policy seeks to use the opportunities provided by increased development to maximise renewable energy generation and energy efficiency, including neighbourhood CHP that will make a significant positive contribution towards this objective.</p> <p>Travel by car may increase greenhouse gas emissions however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel.</p> <p>Development in the following locations is considered to make a positive contribution towards this objective as it may help reduce car travel. The aspects mentioned in relation to each location should help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel through reduced vehicle emissions:</p> <ul style="list-style-type: none"> • New housing and employment in Bradford city centre is likely to be well located in relation to public transport, the cycle network and services / facilities and employment. • New housing in NE, NW, SW and SE Bradford may be able to access existing public transport services (some rail stations and / or high frequency bus route), the cycle network, and local services / facilities and employment. • A high quality commercial and research development led technology park at the Yorkshire Water Treatment Works at Apperley Bridge complemented by a new railway station at Apperley Bridge. 	+

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Development in the following locations contributes uncertainly towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy (see Objective 9) to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned in relation to each location should help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel - exhaust emissions:</p> <ul style="list-style-type: none"> • New housing in Shipley may be able to access existing public transport services (rail and high frequency bus), the cycle network, local services / facilities and employment. However, a high frequency bus route does not serve lower Baildon and the railway line and road network in this location restrict access to the centres of Shipley and Baildon. • New housing in the Canal Road Corridor may be able to access existing public transport services (bus and rail), the local cycle network and employment. However, there are limited services / facilities along the Canal Road Corridor. Residents may therefore travel by car to access services elsewhere. The A6037 may also act as a barrier to access, resulting in car use. • New housing in Holme Wood may be able to access existing public transport services (bus) and employment sites in the locality including new employment in the Leeds-Bradford corridor. Notwithstanding this, there are limited services / facilities within walking distance of the fringe of Holme Wood. Residents may therefore travel by car to access services / facilities elsewhere. • New employment development in the Leeds-Bradford corridor may be accessible using existing bus services. Notwithstanding this, there are currently limited residential areas and other services/facilities within walking distance of the Leeds-Bradford corridor. Employees may therefore be more likely to travel by car. • New employment development in south Bradford (M606) may be accessible using existing bus services. Notwithstanding this, given its proposed location on the outer ring road of Bradford by junction 26 of the M606, employees may choose to access employment in this area by car. 	?

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
4. Safeguard and improve air, water and soil resources	<p>Travel by car may increase emissions to air however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel.</p> <p>Development in the following locations is considered to make a positive contribution towards this objective as it may help reduce car travel. The aspects mentioned should reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling, and thus could help to reduce the effect of car travel upon local air quality:</p> <ul style="list-style-type: none"> • New housing in Bradford city centre would be well located in relation to public transport, services / facilities and employment. Notwithstanding this, it is noted that the Shipley Airedale Road AQMA is just outside of the city centre although the policy could contribute to improvements in air quality in the AQMA. The potential effect of new housing upon traffic levels should be taken into consideration. • New housing in NE, NW, SW and SE Bradford may be able to access existing public transport services (some rail stations and / or high frequency bus route), the cycle network, and local services / facilities and employment. Notwithstanding this, it is noted that air quality at Manningham Lane/Queens Road in north Bradford and Manchester Road/Mayo Avenue is poor although the policy could contribute to improvements in air quality in the AQMA. The potential effect of new housing upon traffic levels should be taken into consideration. 	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned should reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling, and thus could help to reduce the effect of car travel upon local air quality:</p> <ul style="list-style-type: none"> • New housing in Shipley and may be able to access existing public transport services (rail and high frequency bus), the cycle network, services / facilities and employment. However, a high frequency bus route does not serve lower Baildon and the railway line and road network in this location restrict access to the centres of Shipley and Baildon. • New housing in the Canal Road Corridor may be able to access existing public transport (bus and rail) and the local cycle network, services / facilities and employment. Notwithstanding this, there are a limited number of services / facilities along the Canal Road Corridor. Residents may therefore travel by car to access services elsewhere. The A6037 may also act as a barrier to access, resulting car use. • New housing in Holme Wood may be able to access existing public transport services (bus) and employment sites in the locality including new employment in the Leeds-Bradford corridor. However, there are limited services / facilities within walking distance of the fringe of Holme Wood. Residents may therefore travel by car to access services / facilities elsewhere. • New employment development in the Leeds-Bradford corridor may be accessible using existing bus services. Notwithstanding this, there are currently limited residential areas and other services/facilities within walking distance of the Leeds-Bradford corridor. Employees may therefore be more likely to travel by car. • New employment development in south Bradford (M606) may be accessible using existing bus services. Notwithstanding this, given its proposed location on the outer ring road of Bradford by junction 26 of the M606, employees may choose to access employment in this area by car. 	?
	<p>The following new road-based transport projects are proposed whose development could have an impact on air quality primarily due to an increase in traffic flows; although they could equally help improve air quality by diverting traffic away from current congestion. It is recommended that in promoting these, the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following air quality aspects:</p>	

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> • East Bradford Link Road, the road junction at Manchester Road and Mayo Avenue is an AQMA. • Shipley Eastern Link Road, the Shipley Airedale Road AQMA is just outside of the city centre. <p>Under the Environment section there is no mention of water resources or flood risk, despite the River Aire running through the north of Bradford, therefore an objective relating to protecting water resources and improving water quality and preventing/reducing and managing flood risk should be included as there is potential for new housing and employment development to impact upon local water quality and either be at risk of flooding or increase flood risk elsewhere in the catchment.</p> <p>Overall, given no such objective the pattern of development is considered to have a negative effect:</p> <ul style="list-style-type: none"> • The majority of NW and SW Bradford are not located within the floodplain. Notwithstanding this, there is the potential for new housing development to impact upon local water quality. • The majority of the Leeds-Bradford corridor area is not located within the floodplain. Notwithstanding this, there is the potential for new employment development to impact upon local water quality. • The Holme Wood area is not located within the floodplain. Notwithstanding this, as an urban extension there is greater potential for new housing development to impact upon local water quality. There are several watercourses in this area (e.g. such as Kit Wood Beck). • There is the potential for new housing in Bradford city centre to have an effect upon water quality and flood risk. Parts of the city centre lie within Flood Zones 2 and 3. • There is the potential for new housing in Shipley to have an effect upon flood risk. Parts of the land south of Otley Road lie within Flood Zones 2 and 3 associated with the River Aire, including part of the Green Belt. The Leeds and Liverpool Canal also runs through this area. • There is the potential for new housing in the Canal Road Corridor to have an effect upon water quality and flood risk. Parts of the Canal Road Corridor lie within Flood Zones 2 and 3, including open space and existing industrial land adjacent to the A6037. • There is the potential for new housing in parts of NE Bradford to have an effect upon flood risk. Parts of NE Bradford lie within Flood Zones 2 and 3 associated with the River Aire, including part of the Green Belt. The Leeds and Liverpool Canal also runs through this area. • There is the potential for new employment development in south Bradford by Junction 26 of the M606 to have an effect upon water quality and flood risk. A strip of land within this area associated with Hunsworth Beck is designated Flood Zone 2 and 3. There are also other local watercourses in the area (e.g. Sugden Beck and Stubs Beck). 	-

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>The following new transport projects are proposed whose development could have an impact on water quality or flood risk. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following water-related aspects:</p> <ul style="list-style-type: none"> • Light Rail Link Interchange to Bradford Forster Square. • Low Moor Rail Station. • Apperley Bridge Rail Station, this may impact on the Green Belt, be at risk of flooding and result in loss of the floodplain increasing flood risk elsewhere in the catchment depending on the nature of the final proposal. • South East Bradford Link Road and the Connecting Airedale Transport Improvement Project including Canal Road Corridor Improvements and the Shipley Eastern Link Road to ensure the viability and delivery of housing and economic growth in the City of Bradford', this may impact on open space and Green Belt depending on the nature of the final proposal. • Shipley Eastern Link Road, this may impact on open space depending on the nature of the final proposal, a crossing of the River Aire will definitely be required with associated impact on hydrology and flood risk. <p>Whilst Strategic Core Policy SC5 seeks to prioritise the use of PDL (provided that it is not of high environmental value), which would have positive impacts upon this objective, the loss of greenfield land/agricultural land in the following locations which will be required to deliver the number of houses proposed will have minor negative impacts:</p> <ul style="list-style-type: none"> • New housing development in Bradford city centre is most likely to be on previously developed land. • New housing development in the Canal Road Corridor is unlikely to result in the loss of good quality agricultural land. Land at Bolton Woods is classified as Grade 3 (good to moderate) agricultural land, but a large part of this area comprises Bolton Woods Quarry and as a Bradford Wildlife Area should be protected from development. • New housing development in Shipley is unlikely to result in the loss of good quality agricultural land. There is limited land in agricultural use and land is graded as Grade 4 (poor). However, new development in lower Baildon to the south of Otley Road may result in the loss of good quality agricultural land. Part of the Green Belt to the south of Otley Road is classified as Grade 3 (good to moderate) agricultural land. 	-

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> • New housing development in NW and SW Bradford may result in the loss of greenfield land/agricultural land, all of the Green Belt to the west of Bradford is classified as Grade 4 (poor) land but there are areas of Grade 3 (good to moderate land) to the NNW and SSW including around the M606. • New housing development in NE and SE Bradford may result in the loss of good quality agricultural land; all of the Green Belt to the east of Bradford is classified as Grade 3 (good to moderate) land. • New development in Holme Wood may result in the loss of good quality agricultural land. All of the Green Belt to the east of Holme Wood is classified as Grade 3 (good to moderate) land. • New development in the Leeds-Bradford corridor may result in the loss of good quality agricultural land. All of the Green Belt to the east of Bradford is classified as Grade 3 (good to moderate) land. • The development of new employment in south Bradford by Junction 26 of the M606 may result in the loss of good quality agricultural land. The majority of agricultural land in this area is classified as Grade 3 (good to moderate) land. <p>The following new transport projects are proposed whose development could have an impact on soil resources due to the loss of greenfield/agricultural land. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following land use aspects:</p> <ul style="list-style-type: none"> • Light Rail Link Interchange to Bradford Forster Square. • Low Moor Rail Station. • Apperley Bridge Rail Station, this may impact on Green Belt depending on the nature of the final proposal. • South East Bradford Link Road and the Connecting Airedale Transport Improvement Project including Canal Road Corridor Improvements and the Shipley Eastern Link Road to ensure the viability and delivery of housing and economic growth in the City of Bradford', this may impact on open space and/or Green Belt depending on the nature of the final proposal. • Shipley Eastern Link Road, this may impact on open space depending on the nature of the final proposal. 	

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>There is the potential for new housing development in Shipley to have an effect upon biodiversity. Development in this area would involve the use of greenfield land, parts of which are designated as Bradford Wildlife Areas and comprise ancient woodland. Large parts of land south of Otley Road are designated as Bradford Wildlife Areas, ancient woodland and Green Belt. Shipley is around 6.5km from the South Pennine Moors SPA, SAC and SSSI. New development in Shipley should therefore avoid any adverse impacts.</p> <p>There is the potential for new housing development in the Canal Road Corridor to have an effect upon biodiversity. There are several Bradford Wildlife Areas along the Corridor and development of this area would involve the use of Green Belt. The Canal Road Corridor is over 10km from the South Pennine Moors SPA, SAC and SSSI and so new development in this area should not adversely impact upon this designated area. In particular, the Canal Road Corridor will be characterised by Bolton Woods Wildlife Area and a linear park and waterway linking the town centre of Shipley to Bradford City Centre.</p> <p>There is the potential for new development in NE, NW, SE and SW Bradford to have an effect upon biodiversity. There are several areas that are designated as Bradford Wildlife Areas or SEGIs and development of this area would involve the use of Green Belt. The greenfield land may be of biodiversity value. The nearest part of Bradford is around 8km east of the South Pennine Moors SPA, SAC and SSSI and so new development in this area should not adversely impact upon this designated area.</p> <p>There is the potential for new development in the Holme Wood area to have an effect upon biodiversity. There are several areas of woodland in greenfield land, a number of which comprise ancient woodland and are designated as Bradford Wildlife Areas or SEGIs. The greenfield land may also be of biodiversity value. The Holme Wood area is over 13km east of the South Pennine Moors SPA, SAC and SSSI and so new development in this area should not adversely impact upon this designated area.</p> <p>There is the potential for new development in the Leeds-Bradford corridor to have an effect upon biodiversity. There are several areas of woodland in greenfield land, a number of which comprise ancient woodland and are designated as Bradford Wildlife Areas or SEGIs. The greenfield land may also be of biodiversity value. The Leeds-Bradford corridor is over 13km east of the South Pennine Moors SPA, SAC and SSSI and so new development in this area should not adversely impact upon this designated area.</p> <p>There is the potential for the development of new employment in South Bradford by Junction 26 of the M606 to have an effect upon biodiversity. There are several areas of ancient woodland. The greenfield land may also be of biodiversity value.</p> <p>Overall, the policy seeks to conserve and enhance biodiversity. Improvements in the Green Infrastructure network within the urban area along the Shipley and Canal Road Corridor, Bradford City Centre and to the east and west along key public transport corridor (in particular Leeds-Bradford corridor and M606 Corridor) are proposed. The Canal Road Corridor will be characterised by Bolton Woods Wildlife Area and a linear park and waterway linking the town centre of Shipley to Bradford City Centre. The policy also seeks to enhance fragments of habitat, where species take refuge, and improve connectivity between such areas to encourage inter-action between people and wildlife.</p>	+

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>The following new transport projects are proposed whose development could have an impact on biodiversity in the City of Bradford. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following ecological aspects:</p> <ul style="list-style-type: none"> • Light Rail Link Interchange to Forster Square. • Low Moor Rail Station. • Apperley Bridge Rail Station, this may impact on Green Belt and floodplain depending on the nature of the final proposal. • South East Bradford Link Road and the Connecting Airedale Transport Improvement Project including Canal Road Corridor Improvements and the Shipley Eastern Link Road to ensure the viability and delivery of housing and economic growth in the City of Bradford', this may impact on open space and/or Green Belt depending on the nature of the final proposal. • Shipley Eastern Link Road, this may affect open space and a Bradford Wildlife Area depending on the nature of the final proposal a crossing of the River Aire will definitely be required with associated impact on the ecology. 	
6. Maintain and enhance the character of natural and man-made landscapes	<p>The policy proposes the city centre will be characterised by an abundance of high quality public realm including the City Park and linear parkways providing a unique setting for development.</p> <p>The Canal Road Corridor will be characterised by innovative and contemporary architecture. Depending on design, there is the potential for architecture to impact on the setting of historic assets; there is a need to ensure sensitive design, particularly given the proximity of the Saltaire World Heritage Site. The design policies in the Core Strategy will help to ensure that new developments do not adversely impact upon the historic environment.</p> <p>Overall, the policy seeks to protect and enhance landscape character in the City of Bradford resulting in a positive contribution but this does not mitigate the loss of Green Belt. The Green Belt contributes positively to the landscape character of the area. It also plays an important role in preventing urban sprawl and maintaining countryside character and openness. Infill development on open space, greenfield and Green Belt land is also likely to impact upon the visual amenity and sense of place of neighbouring residents:</p> <ul style="list-style-type: none"> • The majority of new housing development in the city centre would be on previously developed land. 	-

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> The development of new employment in south Bradford by Junction 26 of the M606 could impact upon the visual amenity and sense of place of neighbouring residents of Oakenshaw. Development in the Shipley area is likely to result in the loss of Green Belt, if the majority of the Green Belt is developed, the effect could be significant, as the development of this land would result in the urban area of Shipley merging further with Baildon, Cottingley and Bingley. Development in NE, NW, SW and SE Bradford is likely to result in the loss of Green Belt, if the majority of the Green Belt is developed, the effect could be significant, as the development of this land would result in the urban area of Bradford merging with Cottingley, Thornton, Queensbury and Leeds. New development in the Leeds-Bradford corridor would result in the loss of Green Belt, if the majority of the Green Belt were developed; the effect could be significant, as the development of this land would result in the urban area of Bradford merging with Leeds. However, the policy does seek to enhance the role of the green belt between Bradford and Leeds as a high quality Country Park for active recreational leisure for residents of both districts, which will help to avoid these two urban areas merging. Development in the Canal Road Corridor area is likely to result in the loss of open space and greenspace, a large part of which contributes positively to the landscape character of the area. However, the policy states that the Canal Road Corridor will be characterised by Bolton Woods Wildlife Area and a linear park and waterway linking the town centre of Shipley to Bradford City Centre. The green infrastructure network within the urban area along the Shipley & Canal Road corridor will be improved and enhanced. New development in Holme Wood would result in the loss of Green Belt. <p>The following new transport projects are proposed whose development could have an impact on landscape in the City of Bradford. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following landscape aspects:</p> <ul style="list-style-type: none"> Light Rail Link Interchange to Forster Square, this may impact on the built townscape depending on the nature of the final proposal. Low Moor Rail Station. Apperley Bridge Rail Station, this may impact on Green Belt depending on the nature of the final proposal. 	

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> South East Bradford Link Road and the Connecting Airedale Transport Improvement Project including Canal Road Corridor Improvements and the Shipley Eastern Link Road to ensure the viability and delivery of housing and economic growth in the City of Bradford', this may impact on open space and/or Green Belt and the built townscape depending on the nature of the final proposal. Shipley Eastern Link Road, this may impact on open space and the built townscape depending on the nature of the final proposal. 	
7. Protect and enhance historic assets and their settings	<p>There is the potential for new housing development in Bradford city centre to have an effect upon cultural, historic and archaeological assets and their settings. There are over 100 Listed Buildings and four Conservation Areas within the city centre. In particular, the policy proposes the city centre will be characterised by an abundance of high quality public realm including the City Park and linear parkways providing a unique setting for development. The potential for unknown archaeology should also be taken into consideration.</p> <p>There is the potential for new housing development in Shipley to have an effect upon cultural, historic and archaeological assets and their settings in Shipley, particularly the Saltaire World Heritage Site and Conservation Area its associated Listed Buildings. The potential for unknown archaeology should also be taken into consideration.</p> <p>There is the potential for new housing development in the Canal Road Corridor to have an effect upon the Saltaire World Heritage Site at Shipley (e.g. effects upon the setting of Saltaire from increased traffic etc) and Listed Buildings in the Canal Road Corridor. The policy states the Canal Road Corridor will be characterised by innovative and contemporary architecture. Depending on design, there is the potential for architecture to impact on the setting of historic assets; there is a need to ensure sensitive design, particularly given the proximity of the Saltaire World Heritage Site. The potential for unknown archaeology should also be taken into consideration.</p> <p>There is the potential for new housing development in NE, NW, SW and SE Bradford to have an effect upon cultural, historic and archaeological assets and their settings. There are four Conservation Areas in NE Bradford, six in NW Bradford, four in SW Bradford and two in SE Bradford. In NE Bradford, there is also the potential for new housing to indirectly impact upon the Saltaire World Heritage Site. The potential for unknown archaeology to be present in all areas should also be taken into consideration.</p> <p>There is the potential for the development of new housing on Green Belt to the east of Holme Wood to have an effect upon the character and setting of Tong Conservation Area and upon Listed Buildings in the Green Belt and the locality. The potential for unknown archaeology should also be taken into consideration.</p>	M++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>There is the potential for the development of new employment on Green Belt in the Leeds-Bradford Corridor to have an effect upon the character and setting of Tong Conservation Area and upon Listed Buildings in the Green Belt and the locality. The potential for unknown archaeology should also be taken into consideration.</p> <p>There is the potential for the development of employment at Esholt to have an effect upon the character and setting of the Esholt and Leeds and Liverpool Canal Conservation Areas and upon Listed Buildings in the Esholt area. The potential for unknown archaeology should also be taken into consideration.</p> <p>There are few known historic assets within the land south of Oakenshaw by Junction 26 of the M606. Notwithstanding this, the potential effect of new employment development in this area upon the setting of Listed Buildings in the locality should be considered. The potential for unknown archaeology should also be taken into consideration.</p> <p>However, the policy seeks to conserve and enhance the designated and undesignated heritage assets, in particular those within Bradford City Centre and surrounding neighbourhoods; resulting in a significant positive effect. Leisure and tourism related development is encouraged in Saltaire including enhancements to the public realm, whilst respecting the “outstanding and universal” value of the UNESCO World Heritage Status of Saltaire for present and future generations. The policy states that the regeneration of the city centre of Bradford will be supported through effective management and enhancement of the historic environment, which will also help to have significant positive impacts upon this objective.</p> <p>The following new transport projects are proposed whose development could have an impact on heritage in the City of Bradford. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following heritage aspects:</p> <ul style="list-style-type: none"> • Light Rail Link Interchange to Forster Square, this may impact on Listed Buildings and Conservation Areas depending on the nature of the final proposal. • Low Moor Rail Station. • Apperley Bridge Rail Station, this may impact on Green Belt depending on the nature of the final proposal. • South East Bradford Link Road and the Connecting Airedale Transport Improvement Project including Canal Road Corridor Improvements and the Shipley Eastern Link Road to ensure the viability and delivery of housing and economic growth in the City of Bradford', this may impact on open space, Green Belt, and residential areas depending on the nature of the final proposal. 	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> Shipley Eastern Link Road, this may impact on open space, a Conservation Area and residential areas depending on the nature of the final proposal. 	
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	<p>The development of new 27,750 new homes in the Sub Regional City should help to meet identified need in this area.</p> <p>Affordable housing requirements are set out in Policy HO11, with a requirement for up to 15% in inner Bradford, which help to ensure that there is affordable housing affordable housing in the City of Bradford.</p> <p>Housing growth areas are the City Centre (a good range of house types and tenures are required by the policy) and Canal Road Corridor, an urban extension is proposed at Holme Wood.</p> <p>Regeneration of the City Centre, Shipley, Manningham and Holme Wood is proposed, which will help to have significant positive impacts upon this objective.</p> <p>The policy states that new homes will be created in a number of ways including on new sites, redevelopment opportunities and reuse of existing buildings, which will further help to deliver the new homes needed by City of Bradford.</p>	++
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	<p>Development in the following locations is considered to make a significant positive contribution towards this objective:</p> <ul style="list-style-type: none"> New housing in Bradford city centre is likely to be well located in relation to the public transport network, enabling access for everyone. New housing in Shipley should be able to access existing public transport services (rail and high frequency bus services). Notwithstanding this, lower Baildon is not served by a high frequency bus route and the railway line and road network also restrict access to the centres of Shipley and Baildon. New housing in the Canal Road Corridor should be able to access existing public transport services (bus and rail). Notwithstanding this, the Canal Road (A6037) itself could act as a barrier to access. New housing in NE, NW, SW and SE Bradford should be able to access existing public transport services (high frequency bus). 	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Development in the following locations is considered to make a marginal positive contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a significant contribution towards this objective.</p> <ul style="list-style-type: none"> • New housing in Holme Wood may be able to access existing public transport services (bus). However, the frequency of the bus service in this area is unknown. • New employment in the Leeds-Bradford corridor may be able to access existing public transport services (bus). However, the frequency of the bus service in this area is unknown. • New employment development in south Bradford may be accessible using existing bus services. Notwithstanding this, given its proposed location on the outer ring road of Bradford by junction 26 of the M606, residents are likely to access employment in this area by car. <p>The following improvements to existing transport infrastructure are proposed:</p> <ul style="list-style-type: none"> • Improvements to Interchange and Bradford Forster Square. • Improved public transport within City Centre and Shipley Town Centre. • Improve inner and outer ring roads as well as key transport corridors. • Implement stronger demand management in Bradford and in relation to the strategic road network. • Improve public transport access between Leeds and Bradford. • Improve surface access and public transport access to Leeds Bradford International Airport. • Improve cycleways and PROW. <p>These would increase accessibility and contribute positively to reducing congestion.</p>	+
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	<p>The following new transport infrastructure could also contribute positively to reducing congestion but depending on the nature of the final proposals could score negatively against several of the environment objectives and the health and well-being objective due to the potential impact on the natural environment and quality of life if adequate consideration is not given to environmental impact. It is recommended that in promoting the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following environmental aspects:</p>	?

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> Light Rail Link Interchange to Bradford Forster Square, this may impact on Listed Buildings and Conservation Areas depending on the nature of the final proposal. Low Moor Rail Station. Enhancements to the Caldervale and Airedale lines. Apperley Bridge Rail Station, this may impact on floodplain and Green Belt depending on the nature of the final proposal. East Bradford Link Road, this may impact on an AQMA, open space, Green Belt, and residential areas depending on the nature of the final proposal. <p>Shipley Eastern Link Road, this may impact on an AQMA, open space, a Bradford Wildlife Area, a Conservation Area and residential areas depending on the nature of the final proposal, a crossing of the River Aire will also be required</p>	
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	<p>Development in the following locations is considered to make a marginal positive contribution towards this objective. The aspects mentioned reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling:</p> <ul style="list-style-type: none"> New housing in Bradford city centre would be well located in relation to public transport, the cycle network and services / facilities and employment. New housing in NE, NW, SW and SE Bradford may be able to access existing public transport services (some rail stations and / or high frequency bus route) and employment sites in the locality. 	+

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Development in the following locations is considered to make an uncertain towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive effect. The aspects mentioned reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling:</p> <ul style="list-style-type: none"> • New housing in Shipley may be able to access existing public transport services (high frequency bus and rail), the cycle network, local services / facilities and employment. However, a high frequency bus route does not serve lower Baildon and the railway line and road network in this location restrict access to the centres of Shipley and Baildon. • New housing in the Canal Road Corridor may be able to access existing public transport services (bus and rail), the local cycle network and employment. However, there are limited services / facilities along the Canal Road Corridor. Residents may therefore travel by car to access services elsewhere. The A6037 may also act as a barrier to access, resulting in car use. • New housing in Holme Wood may be able to access existing public transport services (bus) and employment sites in the locality including new employment in the Leeds-Bradford corridor. Notwithstanding this, there are limited services / facilities within walking distance of the fringe of Holme Wood. Residents may therefore travel by car to access services / facilities elsewhere. • New employment in the Leeds-Bradford corridor may be able to access existing bus services in the locality. • South Bradford is supported as the location for large-scale industry including storage and distribution to make best use of existing transport connections. New employment development in south Bradford may be accessible using existing bus services. Notwithstanding this, given its proposed location on the outer ring road of Bradford by junction 26 of the M606, residents are likely to access employment in this area by car. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective. However, in all cases there is the potential for new housing to exacerbate congestion, especially at peak times, which would need to be assessed.</p>	?

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p> <p>The following new road-based transport projects are proposed whose development could have an impact on air pollution primarily due to an increase in traffic flows; although they could equally help improve air quality by diverting traffic away from current congestion. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following air quality aspects:</p> <ul style="list-style-type: none"> • South East Bradford Link Road, the road junction at Manchester Road and Mayo Avenue is an AQMA. • Shipley Eastern Link Road, the Shipley Airedale Road AQMA is just outside of the city centre. 	+
11. Improve the quality of the built environment and make efficient use of land and buildings	<p>Overall, the policy seeks to prioritise previously developed land resulting in a positive contribution but this does not mitigate the loss of Green Belt land:</p> <ul style="list-style-type: none"> • New housing development in Bradford city centre is likely to involve the use of previously developed land. There may also be opportunities for the re-use of existing buildings. In particular, the policy proposes the city centre will be characterised by the requirement for high quality public realm linked to the City Park and linear parkways providing a unique setting for development. • New housing development in Shipley and the Canal Road Corridor is likely to involve the development of greenfield land. The policy states the Canal Road Corridor will be characterised by innovative and contemporary architecture. Depending on design, there is the potential for architecture to impact on the setting of historic assets; there is a need to ensure sensitive design, particularly given the proximity of the Saltaire World Heritage Site. The design policies in the Core Strategy will help to ensure that design of new development does not adversely impact upon the historic environment. 	-

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> New housing development in NE, NW SE and SW Bradford is likely to involve the development of greenfield land, including Green Belt. New housing development in SE Bradford and Holme Wood is likely to involve the development of greenfield land, including Green Belt. <p>However, in regards to the Green Belt, it is noted that the use of Green Belt land will be in accordance with Strategic Core Policies SC5 and SC7 and that development of Green Belt land will help to ensure development in sustainable locations.</p> <p>Overall, the policy seeks to protect and enhance landscape character in the City of Bradford resulting in a positive contribution. More importantly it policy seeks to conserve and enhance the heritage values of Bradford City Centre and surrounding neighbourhoods which will have a significant positive contribution on the quality of the built environment. Leisure and tourism related development is encouraged in Saltaire including enhancements to the public realm, whilst respecting the "outstanding and universal" value of the UNESCO World Heritage Status of Saltaire for present and future generations.</p>	++
12. Improve the quality and range of services available within communities and connections to wider networks	<p>Development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> New housing in Bradford city centre would be well located in relation to services / facilities and public transport. Residents should therefore be able to access to a range of services / facilities. New housing in Shipley may be able to access services / facilities in the local area although there are limited services / facilities in the lower Baildon area. Residents may also be able to access services via the public transport network (high frequency bus and rail), which connects the area to Bradford city centre and service centres elsewhere. New housing in NE, NW, SE and SW Bradford may be able to access services / facilities in the local area. Residents may also be able to access services via the public transport network (high frequency bus and some rail stations), which connect the areas to Bradford city centre and service centres elsewhere. 	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective.</p> <ul style="list-style-type: none"> • There are limited services / facilities along the Canal Road Corridor. The A6037 may also act as a barrier to access. However, new housing in this area may be able to access existing public transport services (bus and rail), which connect the area to Bradford city centre and service centres elsewhere. • There are limited services / facilities in proximity of the Holme Wood area. Notwithstanding this, new housing in this area should be able to access existing public transport services (bus), which connect the area to Bradford city centre. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant contribution towards this objective.</p> <p>Notwithstanding this, the effect of an increase in population on existing service provision needs to be considered (i.e. whether there is sufficient capacity to meet demand) and so overall impacts are considered to be uncertain.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service provision improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health , education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	?
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	Overall, the pattern of development will have a significant positive effect. Regeneration of the City Centre, Shipley, Manningham and Holme Wood is proposed, which will help to have a significant positive impact upon this objective.	++
14. Create good cultural, leisure and recreation activities available to all	<p>The creation of a Country Park for active recreation is proposed on Green Belt in East Leeds and improvements to cycleways and PROW are identified that will have a significant positive effect.</p> <p>Improvements in the Green Infrastructure network along the Shipley and Canal Road Corridor, Bradford City Centre and to the east and west along key public transport corridor (in particular Leeds-Bradford corridor and M606 Corridor) are proposed.</p>	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> It is unknown whether new housing development in Bradford city Centre would result in the loss of any open space or greenspace. Any open space / greenspace within the city centre should be afforded protection from development. The Settlement Study identified a lack of provision for children and teenagers, outdoor sporting facilities and community gardens in Bradford city centre. New housing development in Shipley may result in the loss of open space used for leisure and recreation. Notwithstanding this, there are a range of sports and recreation facilities in Shipley. New housing development in the Canal Road Corridor may result in the loss of open space used for leisure and recreation (e.g. playing fields etc). In addition, there are limited formal sports and recreation facilities along the Canal Road Corridor. The Settlement Study indicates that there are a range of sports and recreation facilities in NE, NW, SE and SW Bradford although there are some gaps in open space and recreation provision. It is unknown whether the development of land would result in the loss of leisure and recreation space (e.g. playing fields). The potential loss of leisure and recreation space in this area as a result of new development needs to be considered. New housing development on greenfield land at Holme Wood may result in the loss of open space used for leisure and recreation. The recreational value of land by Holme Wood and leisure and recreation facility provision in the area is unknown. The potential loss of leisure and recreation space in this area needs to be considered. The recreational value of greenfield land, in the Leeds-Bradford corridor and by junction 26 of the M606 is unknown. The potential loss of leisure and recreation space in this area as a result of new employment development needs to be considered, but negative effects are already mitigated by the creation of a Country Park. 	?
	<p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant contribution towards this objective. In particular, the Canal Road Corridor will be characterised by Bolton Woods Wildlife Area and a linear park and waterway linking the town centre of Shipley to Bradford City Centre. In regenerating the peripheral housing estates the policy proposes the creation of community infrastructure although it is not specified what this will involve.</p>	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	The effect of an increase in population on facilities provision also needs to be considered. In the growth areas, the policy already proposes new community facilities; in NE and SE Bradford particular emphasis is placed on the creation of open space and recreation facilities whilst in NW Bradford greenspace, open space and facilities for younger people are specified.	
15. Improve safety and security for people and property	The potential effect of new development in the Sub Regional City upon this objective will depend upon the type and design of any new development. The design policies in the Core Strategy will help to ensure that the design of new development reduces the chance of crime; however, at this stage the effect of this policy is assessed as neutral.	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	<p>Policy supports the role of the Health department in generating employment and seeks to help connect disadvantaged communities to employment that will have a significant positive effect on well-being of the currently unemployed.</p> <p>The creation of a Country Park for active recreation is proposed and improvements to cycleways and PROW are identified.</p> <p>Improvements in the Green Infrastructure network along the Shipley and Canal Road Corridor, Bradford City Centre and to the east and west along key public transport corridor (in particular Leeds-Bradford corridor and M606 Corridor) are proposed.</p> <p>In addition, in terms of health care facilities, development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> There are several doctors' surgeries, dental surgeries and pharmacies in NE, NW, SW and SE Bradford. 	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective.</p> <ul style="list-style-type: none"> • The Settlement Study identifies a lack of dental and doctors surgeries in Bradford city centre. New housing development in this area may therefore not have adequate access to healthcare. • The Settlement Study highlights that access to healthcare facilities in Shipley is poor at present. Although provision in Baildon is good, access to healthcare facilities from south of Otley Road may be constrained by the rail and road network. • The Settlement Study identifies a lack of dental surgeries, doctors' surgeries and pharmacies along the Canal Road Corridor. New housing development in this area may therefore not have adequate access to healthcare. • There are limited healthcare facilities in proximity of Holme Wood. New housing in this area may therefore not have adequate access to healthcare. 	?

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	<p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant contribution towards this objective. Walking and healthcare improvements will also help to have significant positive impacts.</p> <p>Notwithstanding this, the effect of an increase in population on existing healthcare provision needs to be considered (i.e. whether there is sufficient capacity to meet demand) and so overall impacts are considered to be uncertain.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and health provision improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health , education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p> <p>The following new transport projects are proposed whose development could have an impact on quality of life for some residents in the City of Bradford. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the health and quality of life impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following aspects:</p> <ul style="list-style-type: none"> • Light Rail Link Interchange to Forster Square • Low Moor Rail Station • Apperley Bridge Rail Station, this may impact on Green Belt depending on the nature of the final proposal • South East Bradford Link Road, this may impact on AQMA, open space, Green Belt, and residential areas depending on the nature of the final proposal • Shipley Eastern Link Road, this may impact on AQMA, open space, and residential areas depending on the nature of the final proposal 	?

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
17. Promote education and training opportunities which build the skills and capacity of the population	<p>Policy supports the role of the Education department in generating employment.</p> <p>Development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> The Settlement Study indicates that there are six primary schools and one further education facility in Shipley. The Settlement Study indicates that primary and secondary school provision in NE, NW, SE and SW Bradford is good. New housing may therefore have adequate access to existing education provision. The Settlement Study indicates that primary and secondary school provision in SE Bradford is good. New housing in the Holme Wood area may therefore have adequate access to existing education provision. <p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective.</p> <ul style="list-style-type: none"> The Settlement Study identifies a lack of primary and secondary schools in Bradford city centre. New housing in this area may therefore not have adequate access to primary and secondary education. Notwithstanding this, access to further education in the city centre is good. The Settlement Study identifies a lack of primary and secondary schools in the Canal Road Corridor. New housing in this area may therefore not have adequate access to primary and secondary education. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Bradford Education Authority does forward plan for schools looking at future demand for places (against current provision). Information from the education authority suggest that there is spare capacity at present but that by 2019/20 there will be a shortfall in places available (against projected demand). The effect of an increase in population on existing education provision and access to secondary schools in surroundings areas needs to be considered (i.e. whether there is sufficient capacity to meet demand). The policy already proposes new schools in NW Bradford.</p>	<p>+</p> <p>?</p> <p>+</p>

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
	Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and education improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health , education and open space provision would need to be addressed prior to significant housing or employment development taking place.	+
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	<p>97ha of employment land will be provided for the City of Bradford, which will help to increase the number of high quality job opportunities in Bradford.</p> <p>Development in the following locations is considered to make a significant positive contribution towards this objective:</p> <ul style="list-style-type: none"> • New housing in Bradford city centre would have access to existing employment in this area. Residents would also be able to access employment opportunities elsewhere via the public transport network. • New housing in SE Bradford and the Holme Wood area would be able to access the proposed new employment at Leeds-Bradford corridor. Residents may also be able to access existing employment in the surrounding area via the public transport network. <p>Focusing new employment development to the NE and SE of Bradford and along the Airedale Corridor will increase employment provision in these areas and have significant positive impacts upon this objective.</p>	++
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	<p>The development of new housing and employment in the Sub Regional City may help to encourage further inward investment into this area.</p> <p>The City of Bradford including Shipley and lower Baildon is to be the principal focus for indigenous economic development.</p> <p>Bradford city centre is supported as the prime office, small and medium sized creative and knowledge industries, shopping, leisure and tourism location.</p> <p>South Bradford is supported as the location for large-scale industry including storage and distribution to make best use of existing transport connections.</p> <p>The policy supports Shipley Town Centre as a focus for a mix of retail, leisure and office developments, which will help to attract inward investment for Shipley and have a positive impact upon this objective.</p>	++

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SA Objectives	Policy BD1 – City of Bradford including Shipley and Lower Baildon Sub Area	
	Commentary	Scoring
<p>Summary:</p> <p>The policy will have a number of positive impacts across the majority of the SA objectives. The policy will help to deliver a number of improvements for the City of Bradford and Shipley and Lower Baildon Sub Area. The new housing proposed should help to meet identified need in the area and ensure that everyone has the chance to live in good quality housing which meets their needs.</p> <p>The urban regeneration and renewal priorities should help to deliver improvements to the quality of the built environment, help to attract inward investment in these areas, particularly through the creation of a new CBD in the city of Bradford, support for other economic development in Bradford and Shipley and enhancements to the historic environment, and protect and enhance the environment through a variety of measures.</p> <p>There will be a number of public transport improvements which will help to ease congestion, develop an efficient and integrated public transport network and encourage use of sustainable modes of transport, with subsequent beneficial impacts in relation to air quality and climate change. Improvements to public transport will help to ensure that new housing and economic development is sustainable and will help avoid reliance on the car.</p> <p>As noted in the detailed appraisals above the policy will also have some uncertain impacts. This particularly relates to the issue of the potential impacts of the transport improvements. If the public transport improvements identified are not phased in terms of delivery, or if there is not appropriate wording in relation to environmental safeguards then there could be adverse impacts on the environment.</p> <p>Whilst there will be largely significant positive impacts from this policy, some negative impacts have been identified. These relate to the need for green belt releases which has adverse impacts upon the landscape and making efficient use of land, and also in relation to the potential adverse impacts from the public transport improvements identified if the delivery of these improvements is not controlled with appropriate environmental safeguards.</p>		
<p>Mitigation:</p> <p>A variety of considerations are set out in bold text above as part of the policy appraisal.</p>		

Policy AD1 - Airedale Sub area

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	The policy seeks to use the opportunities provided by increased development to maximise renewable energy generation in this sub area and also to maximise energy efficiency through CHP and hydro energy which will make a significant positive contribution towards this objective.	++
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	<p>The new housing and employment land proposed in this policy will result in significant new development and as a result will generate waste. There is no specific mention of waste or measures to minimise waste generation although it would be in accordance with policy WM1 elsewhere in the Core Strategy. New housing development in Keighley and Bingley should be able to access existing recycling facilities and kerbside recycling collection services of two or more recyclables would be feasible. New housing development in the other Airedale towns should be able to access existing recycling facilities and kerbside collection services. On this basis there would be a minor positive impact on this objective.</p> <p>Reference could be made under Environment section of the policy to promoting waste minimisation and encouraging recycling within Airedale in order to increase the sustainability of this policy option.</p>	+
3. Reduce the district's impact on climate change and vulnerability to its effects	<p>The policy seeks to use the opportunities provided by increased development to maximise renewable energy generation and energy efficiency, including CHP and hydro, which will make a significant positive contribution towards this objective.</p> <p>Travel by car may increase greenhouse gas emissions however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel. The policy also refers to the improvement of sustainable transport facilities and links within and between the towns and villages in Airedale, again in order to lessen the effects of road transport.</p> <p>Development in the following locations is considered to make a positive contribution towards this objective as it may help reduce car travel. The aspects mentioned in relation to each location should help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel - exhaust emissions:</p> <ul style="list-style-type: none"> New housing in Keighley and Bingley may be able to access existing public transport services (rail and high frequency bus), local services / facilities and employment. <p>Development in the following locations contributes uncertainly towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy (see Objective 9) to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned in relation to each location should help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel - exhaust emissions:</p>	++

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> • New housing in Steeton with Eastburn may be able to access existing public transport services (rail and / or high frequency bus route), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited in Steeton with Eastburn, residents may have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Silsden may be able to access existing public transport services, local services / facilities and employment in the local area. However, these areas are not served by high frequency bus services and local services / facilities provision and employment is limited in Silsden. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Cottingley may be able to access existing public transport services (high frequency bus), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited, residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Baildon may be able to access existing public transport services (rail and bus), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited, residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. • New housing East Morton may be able to access existing public transport services, local services / facilities and employment in the local area. However, this town is not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant contribution towards this objective.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve the improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place</p>	
4. Safeguard and improve air, water and soil resources	Travel by car may increase emissions to air however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel. In addition, it seeks to improve air quality in the AQMA through Air Quality Management Area Action Plans, which will make a positive contribution towards this objective.	?

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>Development in the following locations is considered to make a positive contribution towards this objective as it may help reduce car travel. The aspects mentioned by help to reduce the need to travel by car for short journeys and encourage use of more sustainable modes of transport, and thus could help to reduce the effect of car travel upon local air quality:</p> <ul style="list-style-type: none"> • New housing in Keighley and Bingley may be able to access existing public transport services (rail and high frequency bus), the cycle network, services / facilities and employment. <p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned should reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling, and thus could help to reduce the effect of car travel upon local air quality:</p> <ul style="list-style-type: none"> • New housing in Steeton with Eastburn may be able to access existing public transport services (rail and / or high frequency bus route), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited in Steeton with Eastburn, residents may have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Silsden may be able to access existing public transport services, local services / facilities and employment in the local area. However, Silsden is not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Cottingley may be able to access existing public transport services (high frequency bus route), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited, residents may have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Baildon may be able to access existing public transport services (rail and bus), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited, residents may have to travel by car to access certain services / facilities and employment elsewhere. • New housing in East Morton may be able to access existing public transport services, local services / facilities and employment in the local area. However, this town is not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. 	

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be 3 could have an impact on air quality primarily due to an increase in traffic flows; although they could equally help improve air quality by diverting traffic away from current congestion. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following air quality aspects:</p> <ul style="list-style-type: none"> • Silsden East Bypass Road. • A650 and A629/A644 Transport Corridors. <p>The Environment section of the policy seeks to protect and enhance river, beck and canal corridors, their value for biodiversity and heritage, potential for reducing flood risk and role in improving connectivity between urban and rural areas. The policy also recognises that there are opportunities with new development to improve green infrastructure and flood storage provision, particularly in relation to the upper Aire. This will have positive impacts upon this objective.</p> <p>There is the potential for new housing development in Keighley and Bingley to have an effect upon water quality and flood risk. Parts of these Principal Towns lie within Flood Zones 2 and 3 associated with the River Aire, including Green Belt land.</p> <p>There is the potential for new development in Steeton and Silsden to have an effect upon water quality and flood risk, parts of these towns and / or the surrounding greenfield land lie within or in close proximity to significant areas of floodplain.</p> <p>There is the potential for new development in Cottingley, East Morton, and Baildon to have an effect upon water quality and flood risk. Parts of these Local Service Centres and / or the surrounding greenfield land are within or in close proximity to significant areas of floodplain.</p> <p>The following new transport projects are proposed whose development could have an impact on water quality or flood risk. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following water-related aspects:</p>	

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> Beechcliffe Rail Station, this may impact on open space and Green Belt land depending on the nature of the final proposal. Silsden East Bypass Road, this may impact on floodplain and Green Belt land depending on the nature of the final proposal, a crossing of the River Aire will definitely be required with associated impact on hydrology and flood risk. <p>Overall, the policy seeks to redevelop previously developed land including the redevelopment of, for example of Keighley college site, resulting in a positive contribution but this does not mitigate the loss of greenfield land/agricultural land in the following locations which will be required to deliver the number of houses proposed:</p> <ul style="list-style-type: none"> Depending upon the location of new housing and employment in Bingley and Keighley, there is the potential for development to result in the loss of Grade 3 (good to moderate) agricultural land. There are small areas of land to the north of Keighley, either side of the River Aire, which are classified as Grade 3. Land to the north of Bingley is classified as Grade 3 although land to the south is Grade 4. Depending upon the location of new housing in Silsden and Steeton, there is the potential for development to result in the loss of Grade 3 (good to moderate) agricultural land surrounding these towns. Depending upon the location of new development in Cottingley and Baildon, there is the potential for development to result in the loss of Grade 3 (good to moderate) agricultural land surrounding these towns. New development in East Morton is unlikely to result in the loss of good quality agricultural land. Agricultural land surrounding this town is graded as Grade 4. <p>The following new transport projects are proposed whose development could have an impact on soil resources due to the loss of greenfield/agricultural land. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following land use aspects:</p> <ul style="list-style-type: none"> Beechcliffe Rail Station, this may impact on open space and Green Belt land depending on the nature of the final proposal; and Silsden East Bypass Road, this may impact on Green Belt land depending on the nature of the final proposal. 	

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SA Objectives	Policy AD1 – Airedale Sub Area	
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5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>There is the potential for new housing and employment development in Keighley to have an effect upon biodiversity (e.g. disturbance, loss of habitat). Development of this area would involve the use of Green Belt, parts of which are designated as Bradford Wildlife Areas and comprise ancient woodland. There are also several Bradford Wildlife Areas within the Keighley urban area. Keighley is within 5km of the South Pennine Moors SPA, SAC and SSSI. The HRA undertaken identified the need for an exclusion zone around the South and North Pennine Moors SPA and SAC in order to avoid adverse impacts on these areas. Careful consideration will need to be given to the exact locations of any new housing and economic development in Keighley to ensure adverse impacts on these designations are avoided. This is reflected in the requirements of the Strategic Core Policy SC 8 Protecting the South Pennine Moors and their zone of influence (which extends out to 2.5 km from the boundary of the SPA and SAC).</p> <p>There is the potential for new housing in Bingley to have an effect upon biodiversity (e.g. disturbance, loss of habitat). There are several Bradford Wildlife Areas, ancient woodland, and SEGIs within and / or in the area surrounding Bingley. Bingley is also within 2km of the South Pennine Moors SPA, SAC and SSSI.</p> <p>There is the potential for new housing development in Silsden and Steeton to have an effect upon biodiversity (e.g. disturbance, loss of habitat). There are two Bradford Wildlife Areas in Steeton and two in Silsden, ancient woodland, and / or SEGIs within and / or in the area surrounding the towns and both brownfield and greenfield land can also support a range of habitats and species. Steeton and Silsden are within 5km of the South Pennine Moors SPA, SAC and SSSI.</p> <p>There is the potential for new development in Baildon, Cottingley and East Morton to have an effect upon biodiversity (e.g. disturbance, loss of habitat). There are several Bradford Wildlife Areas, ancient woodland, and / or SEGIs within and / or in the area surrounding the towns and both brownfield and greenfield land can also support a range of habitats and species. East Morton is within 1km of the South Pennine Moors SPA, SAC and SSSI. Cottingley, and Baildon are within 5km. Again careful consideration will need to be given to ensure that new development in these areas does not adversely impact upon this designation.</p> <p>Overall, the policy seeks to protect and enhance biodiversity in Airedale and protect the integrity of nationally and internationally designated sites, particularly through management of land use and public access, resulting in a significant positive contribution. The policy also includes a requirement to improve Green Infrastructure along the River Aire and for canal and public transport corridors as well as flood storage provision, particularly in relation to the Upper Aire.</p> <p>The policy wording could be improved through specific mention of protecting Bradford Wildlife Areas, SEGIs and protected and other notable species in Airedale.</p>	++

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>The following new transport projects are proposed whose development could have an impact on biodiversity in Airedale. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following ecological aspects:</p> <ul style="list-style-type: none"> Beechcliffe Rail Station, this may impact on open space and Green Belt land depending on the nature of the final proposal. Silsden East Bypass Road, this may impact on floodplain and Green Belt land depending on the nature of the final proposal. 	
6. Maintain and enhance the character of natural and man-made landscapes	<p>Overall, the policy seeks to protect and enhance landscape character in Airedale resulting in a positive contribution but this does not mitigate the loss of Green Belt land. The Green Belt contributes positively to the landscape character of the area. It also plays an important role in preventing urban sprawl and maintaining countryside character and openness. Infill development on open space, greenfield and Green Belt land is also likely to impact upon the visual amenity and sense of place of neighbouring residents:</p> <ul style="list-style-type: none"> There are no landscape designations covering Keighley. Notwithstanding this, new housing and employment development in Keighley is likely to result in the loss of greenfield land, including Green Belt. There are no landscape designations covering Bingley. Notwithstanding this, new housing development in Bingley is likely to result in the loss of greenfield land, including Green Belt. There is the potential for new development on brownfield sites in Silsden and Steeton to have an effect upon the townscape. The effect will depend upon the scale and nature of the development. It is noted that brownfield development presents an opportunity to enhance the townscape (e.g. through the re-use of derelict sites and buildings as part of regeneration proposals for these sites). However, new housing development may also involve the use of greenfield land, including Green Belt deletions at Steeton. There is the potential for new development on brownfield sites in Baildon, Cottingley and East Morton to have an effect upon the townscape. The effect will depend upon the scale and nature of the development. It is noted that brownfield development presents an opportunity to enhance the townscape (e.g. through the re-use of derelict sites and buildings) in these areas. However, new housing development in these towns may also involve the use of greenfield land, although no Green Belt deletions are proposed. 	-

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>The following new transport projects are proposed whose development could have an impact on landscape in Airedale. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following landscape aspects:</p> <ul style="list-style-type: none"> Beechcliffe Rail Station, this may impact on open space and Green Belt land depending on the nature of the final proposal. Silsden East Bypass Road, this may impact on Green Belt land and the built townscape depending on the nature of the final proposal. <p>Overall there will be a minor negative impact on this objective due to the loss of Green Belt land, though it is recognised that will help to meet the growth needs of the Airedale sub area.</p>	
7. Protect and enhance historic assets and their settings	<p>There is the potential for new housing and employment development in Keighley to have an effect upon cultural, historic and archaeological assets and their settings. Keighley Town Centre is a designated Conservation Area and there are a number of Listed Buildings in the town, including the Grade II listed Aireworth Mill within an RUDP employment site (Aireworth Road).</p> <p>There is the potential for new housing and employment development in Bingley to have an effect upon cultural, historic and archaeological assets and their settings, including the Bingley and Leeds and Liverpool Canal Conservation Areas and Listed Buildings within and surrounding the town.</p> <p>The potential indirect effects of new housing and employment in the Airedale corridor upon the Saltaire World Heritage Site (e.g. from traffic) and for unknown archaeology should also be taken into consideration.</p> <p>There is the potential for new housing and employment development in Silsden and Steeton to have an effect upon Listed Buildings and upon the character and setting of Conservation Areas within the towns; the potential for unknown archaeology to be present in all areas should also be taken into consideration.</p> <p>There is the potential for new housing development in Baildon, Cottingley and East Morton to have an effect upon Listed Buildings and for development in Baildon and East Morton to affect the character and setting of Conservation Areas within these towns. In Baildon, there is also the potential for new housing to indirectly impact upon the Saltaire World Heritage Site. The potential for unknown archaeology to be present in all areas should also be taken into consideration.</p> <p>However, the policy seeks to conserve and enhance the designated and undesignated heritage assets in particular those within the boundary of the Keighley Townscape Heritage and Initiative and Saltaire World Heritage Site, resulting in a significant positive effect.</p>	++

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>The following new transport projects are proposed whose development could have an impact on heritage in Airedale. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following heritage aspects:</p> <ul style="list-style-type: none"> Beechcliffe Rail Station. Silsden East Bypass Road, this may potentially impact on Listed Buildings and a Conservation Area depending on the nature of the final proposal. 	
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	<p>The development of 8,450 new homes in the Airedale corridor should help to meet identified need in this area. Policy HO11 sets out affordable housing provision with a requirement for up to 20% in towns, suburbs and villages and up to 15% in inner Bradford and Keighley. The policy also states that affordable housing will be required on sites of 15 dwellings or more and on sites over 0.4 hectares in size. This threshold is lowered to 5 dwellings in Cottingley. This will help to ensure that there are affordable homes in this area and contribute positively towards this objective.</p> <p>The SHMA identifies a need to ensure deliver of affordable housing for rural areas in the Worth Valley. In particular the SHMA also identifies 728 households with current need and 71 households in future need. The loss of the 29% affordable housing requirement could be a concern, although it is noted that the policy ensures that affordable housing requirements are consistent with the SHMA.</p> <p>Housing growth areas are Silsden and Steeton, in combination with good walking and cycling links to Silsden and Steeton railway and bus interchange, which will help to ensure that new housing in these areas is sustainable.</p> <p>Regeneration of the Airedale Corridor, Keighley and Bingley is proposed, which will further help to have positive impacts upon this objective.</p> <p>450 new homes will be created in Baildon, along with smaller scale housing development in Cottingley and East Morton to meet local need, which will also help to have significant positive impacts upon this objective.</p>	++
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	<p>The policy also refers to the improvement of sustainable transport facilities and links within and between the towns and villages in Airedale which will contribute towards a more integrated and efficient transport network.</p> <p>Development in the following locations is considered to make a significant positive contribution towards this objective:</p> <ul style="list-style-type: none"> New housing in Keighley and Bingley would be able to access existing public transport services (high frequency bus and rail). 	++

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> New housing in Steeton would be able to access existing public transport services (rail and high frequency bus). New housing in Cottingley would be able to access existing public transport services (high frequency bus route). New housing in Bingley would be able to access existing public transport services (rail and bus). <p>Development in the following locations is considered to make a marginal positive contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a significant contribution towards this objective.</p> <ul style="list-style-type: none"> There is limited public transport service provision (i.e. no high frequency bus services) in Silsden. There is limited public transport service provision (i.e. no high frequency bus services) in East Morton. 	
	<p>The following improvements to existing transport infrastructure are proposed:</p> <ul style="list-style-type: none"> Improved public transport within and between Airedale towns and villages including rail stations, cross-valley links, cycleways and PROW. Enhanced bus network to/from Steeton and Silsden bus/rail interchange. Transport improvements to Hard Ings Road and Keighley town centre. Improve key transport corridors including A6550, A629/A644, A629 and A6038. Implement stronger demand management in Airedale. Improve public transport access between Airedale and the City of Bradford, Craven and Leeds. Improve surface access and public transport access to Leeds Bradford International Airport by encouraging more direct public transport connections with Keighley and Bingley. <p>These would increase accessibility and contribute positively to reducing congestion.</p>	+

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>The following new transport infrastructure could also contribute positively to reducing congestion but depending on the nature of the final proposals could score negatively against several of the environment objectives and the health and well-being objective due to the potential impact on the natural environment and quality of life if adequate consideration is not given to environmental impact. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following environmental aspects:</p> <ul style="list-style-type: none"> • Beechcliffe Rail Station, this may impact on open space and Green Belt land depending on the nature of the final proposal. • Silsden East Bypass Road, this may impact on floodplain, Green Belt land and potentially Listed Buildings and a Conservation Area depending on the nature of the final proposal, a crossing of the River Aire will also be required. 	?
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	<p>Development in the following locations is considered to make a marginal positive contribution towards this objective. The aspects mentioned reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling:</p> <ul style="list-style-type: none"> • New housing in Keighley and Bingley may be able to access existing public transport services (high frequency bus and rail), the cycle network, local services / facilities and employment. 	+

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>Development in the following locations is considered to make an uncertain towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive effect. The aspects mentioned reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling:</p> <ul style="list-style-type: none"> • New housing in Steeton with Eastburn may be able to access existing public transport services (rail and / or high frequency bus route), the cycle network, local services / facilities and employment. However, residents may have to travel by car to access certain services elsewhere. • New housing in Silsden may be able to access existing public transport services, local services / facilities and employment. However, the area is not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Cottingley may be able to access existing public transport services (high frequency bus route), the cycle network, local services / facilities and employment. However, residents may have to travel by car to access certain services elsewhere. • New housing in Baildon may be able to access existing public transport services (rail), the cycle network, local services / facilities and employment. However, residents may have to travel by car to access certain services elsewhere. • New housing in East Morton may be able to access existing public transport services, local services / facilities and employment. However, this town is not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. 	?

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective. However, in all cases there is the potential for new housing to exacerbate congestion, especially at peak times, which would need to be assessed.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p> <p>The following new road-based transport projects are proposed whose development could have an impact on air pollution primarily due to an increase in traffic flows; although they could equally help improve air quality by diverting traffic away from current congestion. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following air quality aspects:</p> <ul style="list-style-type: none"> Silsden East Bypass Road. 	+
11. Improve the quality of the built environment and make efficient use of land and buildings	<p>Overall, the policy seeks to redevelop previously developed land, resulting in a positive contribution but this does not mitigate the loss of Green Belt land:</p> <ul style="list-style-type: none"> New development in Bingley and Keighley is likely to involve the development of greenfield land, including Green Belt. New development in Steeton is likely to involve the development of greenfield land, including Green Belt. No Green Belt deletions are proposed at Silsden, Baildon, Cottingley or East Morton although greenfield land may still be developed. 	++
	<p>Overall, the policy seeks to protect and enhance landscape character in the Airedale corridor resulting in a positive contribution. More importantly it policy seeks to conserve and enhance the heritage values of Keighley, Bingley, Shipley and surrounding neighbourhoods which will have a significant positive contribution on the quality of the built environment.</p> <p>Some flexibility in affordable housing targets is also allowed to secure the most appropriate level and quality of development.</p>	-
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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
12. Improve the quality and range of services available within communities and connections to wider networks	<p>Development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> New housing in Keighley and Bingley may be able to access services / facilities in the local area. Residents would also be able to access services via the public transport network (rail and high frequency bus), which connect Keighley and Bingley to the Sub Regional City. 	+
	<p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the Policy to address deficiencies that have been identified resulting in a positive contribution towards this objective.</p> <ul style="list-style-type: none"> New housing in Silsden may be able to access existing public transport services and local services / facilities. However, it is not served by high frequency bus services and services / facilities provision is limited in these areas. Residents may therefore have to travel to access certain services / facilities elsewhere. New housing in Steeton with Eastburn may be able to access local services / facilities and the existing public transport network (rail and / or high frequency bus route), which connect the town to the Sub Regional City. Notwithstanding this, services / facilities provision is limited in these areas; residents may have to commute to access certain services / facilities elsewhere. New housing in Cottingley would be able to access services / facilities in the local area. Residents would also be able to access services / facilities elsewhere via the public transport network (high frequency bus route), which connect the town to the Sub Regional City. Notwithstanding this, services / facilities provision and employment is limited, residents may have to travel to access certain services / facilities elsewhere. New housing in Baildon would be able to access services / facilities in the local area. Residents would also be able to access services / facilities elsewhere via the public transport network (rail and bus), which connect the town to the Sub Regional City. Notwithstanding this, services / facilities provision and employment is limited, residents may have to travel to access certain services / facilities elsewhere. However, as part of the 450 new homes proposed for Baildon, new community facilities will be provided, which will help to have positive impacts upon this objective. New housing in East Morton may be able to access existing public transport services and local services / facilities. However, this town is not served by high frequency bus services and services / facilities provision is limited in these areas. Residents may therefore have to travel to access certain services / facilities elsewhere. 	?

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Notwithstanding this, the effect of an increase in population on existing service provision needs to be considered (i.e. whether there is sufficient capacity to meet demand).</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service provision improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	+
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	<p>Overall, the pattern of development will have a significant positive effect. Regeneration of the Airedale Corridor, Keighley and Bingley is proposed and will help to have a significant positive impact upon this objective.</p>	++
14. Create good cultural, leisure and recreation activities available to all	<p>Improvements to cycleways and PROW are identified that will have a significant positive effect.</p> <p>Improvements to the Green Infrastructure along the Airedale river, canal and public transport corridors are proposed.</p> <p>The policy supports the role of Keighley and Bingley town centres as locations for leisure developments, which will help to have positive impacts on this objective.</p> <ul style="list-style-type: none"> • The Settlement Study indicates that there are a range of sports and recreation facilities in Keighley and Bingley and the policy proposes further community facilities (especially sports facilities and local shops) in Keighley. • The Settlement Study indicates that there are outdoor sporting facilities, parks and gardens, provision for children and teenagers and community facilities in Silsden, although the policy proposes the creation of community facilities but does not specify what these will be (amenity green space is required). • The Settlement Study identifies a lack of parks and gardens, civic spaces and community facilities in Steeton, although the policy proposes the creation of community facilities but does not specify what these will be (parks and gardens, play areas and allotments are required). • The Settlement Study identifies a lack of parks and gardens and / or community facilities in Baildon, Cottingley and East Morton. • There is also a lack of provision for children and teenagers in Cottingley and East Morton. 	+

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> It is unknown whether the development of land would result in the loss of leisure and recreation space (e.g. playing fields). The potential loss of leisure and recreation space in this area as a result of new development needs to be considered. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant contribution towards this objective.</p> <p>The effect of an increase in population on facilities provision also needs to be considered.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and community facility improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p> <p>The following new transport projects are proposed whose development could have an impact on open space in Airedale. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the quality of life impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following aspects:</p> <ul style="list-style-type: none"> Beechcliffe Rail Station, this may impact on open space and Green Belt land depending on the nature of the final proposal Silsden East Bypass Road, this may impact on Green Belt land 	
15. Improve safety and security for people and property	<p>The potential effect of new development in the Airedale corridor upon this objective will depend upon the type and design of any new development and so effects are difficult to quantify at this stage.</p> <p>Mitigating flood risk will help to reduce the risk of flooding for people and property and improve community safety in this respect making a minor positive contribution towards this objective.</p>	+
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	<p>Policy supports the role of the Health department and seeks to help connect disadvantaged communities to employment, which will have a significant positive effect on well-being of the currently unemployed.</p> <p>Improvements to cycleways and PROW are identified, which will help to encourage walking and cycling and have a positive on improving health and well-being in Bradford.</p> <p>Improvements to the Green Infrastructure along the Airedale river, canal and public transport corridors. This will help to make these areas more attractive and may encourage more walking and cycling, which would have positive impacts upon this objective.</p>	

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>In addition, in terms of health care facilities, development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> • There are several doctors' surgeries, dental surgeries and pharmacies in Keighley and Bingley, furthermore, additional health provision in this town is proposed. • The Settlement Study indicates that there are dental surgeries, doctors' surgeries and pharmacies in Silsden. Notwithstanding this, Silsden only has one doctor's and dental surgery. • The Settlement Study indicates that there are dental surgeries, doctors' surgeries and pharmacies in Cottingley and Baildon. Notwithstanding this, each Local Service Centre typically has one doctor's and dental surgery. <p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective in relation to access to health care.</p> <ul style="list-style-type: none"> • The Settlement Study indicates that there is one pharmacy and doctor's surgery in Steeton. However, there is no dentist in the town. That said, Airedale General Hospital is located in Steeton. • The Settlement Study indicates that there are no dental surgeries, doctors' surgeries or pharmacies in East Morton. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant contribution towards this objective.</p> <p>Notwithstanding this, the effect of an increase in population on existing healthcare provision needs to be considered (i.e. whether there is sufficient capacity to meet demand).</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and health provision improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	++

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>The following new transport projects are proposed whose development could have an impact on quality of life for some residents in Airedale. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the health and quality of life impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following aspects:</p> <ul style="list-style-type: none"> Beechcliffe Rail Station, this may impact on open space and Green Belt land depending on the nature of the final proposal Silsden East Bypass Road, this may impact on Green Belt land. 	
17. Promote education and training opportunities which build the skills and capacity of the population	<p>Policy supports the role of the Education Authority in generating employment, which will help to have significant positive impacts upon this objective</p> <p>Development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> There are 14 primary schools, three secondary schools and four further education facilities in Keighley. These facilities could be accessible from new housing development. There are six primary schools, one secondary school and one further education facility in Bingley. These facilities could be accessible from new housing development. The Settlement Study indicates that there are one or more primary schools in Silsden and Steeton. The Settlement Study indicates that there are one or more primary schools in Baildon and East Morton. <p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the Policy to address deficiencies that have been identified resulting in a positive contribution towards this objective.</p> <ul style="list-style-type: none"> The Settlement Study indicates that there is no primary school in Cottingley. Residents of new housing in Cottingley would therefore have to travel to access education facilities elsewhere. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Notwithstanding this, it is unknown whether these schools have the capacity to meet demand. The effect of an increase in population on existing education provision and access to secondary schools in surroundings areas needs to be considered (i.e. whether there is sufficient capacity to meet demand).</p>	++

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
	<p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and education improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	<p>The policy states that Keighley and Bingley will be the principal focus for indigenous economic development including starter units for small and medium sized business, business park premises for larger digital, design and knowledge, financial and service sectors at Dalton Lane Business Innovation Zone and Royd Ings Associated with the proposed Beechcliffe railway station.</p> <p>The policy will increase opportunities to provide additional jobs in locations and of a type suited to the local needs of the workforce in the Airedale corridor and so make a significant contribution towards this objective.</p> <p>Development in the following locations is considered to make a significant positive contribution towards this objective:</p> <ul style="list-style-type: none"> • New housing in Keighley and Bingley would have access to existing employment in these areas, which have a large employment base, as well as the new employment along the Airedale corridor. Residents would also be able to access employment opportunities in the Sub Regional City via the public transport network. • New housing in Steeton and Silsden would be able to access local employment in these areas and proposed new employment developed along the Airedale Corridor and at Silsden Rural Business Park. Residents would also be able to access employment opportunities elsewhere via the public transport network (rail and / or high frequency bus route). <p>Focusing new employment development along the Airedale Corridor and at Silsden Rural Business Park will increase employment provision in these areas.</p>	++
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	<p>The development of new housing and employment in the Airedale corridor, including starter units in Keighley and Bingley for SME, should help to encourage further inward investment into this area.</p> <p>The creation of employment land at Silsden Rural Business Park will help to attract new economic development and investment to this area, which will also help to have a positive impact upon this objective.</p>	++

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SA Objectives	Policy AD1 – Airedale Sub Area	
	Commentary	Scoring
<p>Summary</p> <p>The policy will have a number of significant positive impacts for the Airedale Sub Area, particularly in relation to the environment, as although the policy sets out new growth in this area, the policy also sets out significant environmental protection measures, which has positive impacts in relation to climate change, biodiversity and the historic environment. However, careful consideration needs to be given to ensure that new development does not adversely impact upon the South Pennine Moors SPA and SAC, especially given the findings of the HRA in relation to exclusion zones.</p> <p>There will be significant transport improvements through the Airedale Sub Area, which will help to reduce congestion and increase use of sustainable modes of transport, which also has beneficial impacts in relation to climate change and air quality through reduced vehicle emissions. The policy could help to improve health and well-being with support for the role of the health department and improvements to walking and cycleways and also through new leisure schemes.</p> <p>There will also be significant economic benefits for the Airedale Sub Area through this policy as the measures in the policy will help to deliver new economic development in Keighley and Bingley and additional employment land at Silsden Rural Business Park.</p> <p>There is a negative impact in relation to making efficient use of land as green belt releases will be required to ensure that development needs in the Airedale sub area are met, though it is noted that there is a requirement for these to be in sustainable locations.</p> <p>Whilst as noted above, the transport improvements will have a number of benefits, there are also some uncertain impacts as the transport improvements identified could have adverse environmental impacts without appropriate safeguarding measures in places, as identified in the appraisals above. Phasing of public transport improvements would help to ensure that some of the other positive impacts identified by this policy are realised.</p>		
<p>Mitigation:</p> <p>A number of considerations in relation to this policy are set out in bold text above.</p>		

Policy WD1 Wharfedale Sub Area

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	<p>The new development proposed for Ilkley, Addingham and Burley in Wharfedale and Menston will use energy and natural resources. The policy makes no mention of renewable energy or seeking to make efficient use of energy and natural resources.</p> <p>However, this policy will be read in conjunction with all others in the Plan. For example, it is recognised that policy EN6 promotes renewable and low carbon energy generation, supporting renewable energy generation targets and helping to reduce the need to generate energy from the burning of fossil fuels. Strategic Core Policy 2 and HO9 re relevant, which address carbon reduction, energy efficiency and housing design quality (including the use of sustainable design). This will help to mitigate to some extent the effect that no direct reference is made in the policy to renewable energy generation.</p> <p>It is also noted that this area is very sensitive for renewable energy generation in light of the landscape character assessment and the findings of the HRA.</p> <p>Overall and in light of the wider policy framework in the plan given by Strategic Core Policy SC2, Environment Policy EN6 and Housing Policy HO9, impacts will not be negative.</p> <p>Reference could be made under the Environment section to use the opportunities provided by new development to maximise renewable energy generation and opportunities for energy efficiency, with due consideration give to the appropriateness of development given landscape character.</p>	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	<p>The new housing and employment land proposed in this policy will result in significant new development and as a result will generate waste. There is no specific mention of waste or measures to minimise waste generation although it would be in accordance with policy WM1 elsewhere in the Core Strategy. However, it is acknowledged that there is a high degree of environmental sensitivity in this area due to landscape character assessment of this area and findings of the HRA.</p> <p>New housing development in Ilkley should be able to access existing recycling facilities and kerbside recycling collection services of two or more recyclables would be feasible. New housing development in the other Wharfedale towns should be able to access existing recycling facilities and kerbside collection services, which will help to have a minor positive impact upon this objective.</p> <p>Reference could be made under the Environment section to promoting waste minimisation and encouraging recycling within Wharfedale in order to increase the sustainability of this policy option.</p>	+

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
3. Reduce the district's impact on climate change and vulnerability to its effects	<p>Travel by car may increase greenhouse gas emissions however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel.</p> <p>Development in the following locations contributes uncertainly towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy (see Objective 9) to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned in relation to each location should help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel - exhaust emissions:</p> <ul style="list-style-type: none"> • New housing in Ilkley may be able to access existing public transport services (bus and rail), local services / facilities and employment. However, Ilkley is not served by a high frequency bus route, which may discourage bus use and trains on the rail line are already at full capacity during peak times. • New housing in Burley and Menston may be able to access existing public transport services (bus and rail), local services / facilities and employment in the local area. However, these areas are not served by high frequency bus services and local services / facilities provision and employment is limited in both towns. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. Trains on the rail line are also already at full capacity during peak times. • New housing in Addingham may be able to access existing public transport services (bus), local services / facilities and employment in the local area. However, Addingham is not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant contribution towards this objective.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p> <p>Reference could also be made under the Environment section to use the opportunities provided by new development to maximise renewable energy generation and opportunities for energy efficiency.</p>	?

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
4. Safeguard and improve air, water and soil resources	<p>Travel by car may increase emissions to air however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel.</p> <p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned should reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling, and thus could help to reduce the effect of car travel upon local air quality:</p> <ul style="list-style-type: none"> • New housing in Ilkley may be able to access existing public transport services (bus and rail), local services / facilities and employment. However, Ilkley is not served by a high frequency bus route, which may discourage bus use and trains on the rail line are already at full capacity during peak times. • New housing in Burley and Menston may be able to access existing public transport services, local services / facilities and employment in the local area. However, Burley and Menston are not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. Trains on the rail line are also already at full capacity during peak times. • New housing in Addingham may be able to access existing public transport services, local services / facilities and employment in the local area. However, Addingham is not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	?(Air Resources)

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
	<p>This policy sees to protect and enhance the role of the River Wharfe as a key green infrastructure corridor and the ecosystem services it provides in relation to biodiversity, water quality and flood risk reduction, amongst other things. This will help to protect water resources and have a minor positive impact upon this objective.</p> <p>Whilst flood risk is mentioned, there is potential for development in the floodplain to take place and so the following developments could have negative impacts:</p> <ul style="list-style-type: none"> • There is the potential for new housing development in Ilkley to have an effect upon water quality and flood risk. Parts of this town lie within Flood Zones 2 and 3 associated with the River Wharfe, including Green Belt land. • There is the potential for new development in Burley and Menston to have an effect upon water quality and flood risk, parts of these towns and / or the surrounding greenfield land lie within or in close proximity to significant areas of floodplain. • There is the potential for new development in Addingham to have an effect upon water quality and flood risk. Parts of this Local Service Centres and / or the surrounding greenfield land are within or in close proximity to significant areas of floodplain. <p>However, given the policy aims to protect and enhance the role of the River Wharfe in relation to water quality and flood risk reduction, overall there will be positive impacts in relation to water quality.</p> <p>The policy will help to re-use PDL and help to minimise use of greenfield land resulting in a positive contribution in relation to soil resources, but this does not mitigate the loss of greenfield land/agricultural land in the following locations which will be required to deliver the number of houses proposed:</p> <ul style="list-style-type: none"> • Ilkley will see the creation of 800 new homes in focused on urban redevelopment opportunities including a significant contribution from green belt changes in sustainable locations. The policy also identifies the creation of high quality employment land at Ilkley. Depending upon the location of new housing and employment in Ilkley, there is the potential for development to result in the loss of Grade 3 (good to moderate) agricultural land. Land alongside the River Wharfe, to the north, east and west of Ilkley, the land is Grade 3. 	<p>+(water resources)</p>

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> Depending upon the location of new housing in Menston and Burley, there is the potential for development to result in the loss of Grade 3 (good to moderate) agricultural land surrounding these towns. Depending upon the location of new development in Addingham, there is the potential for development to result in the loss of Grade 3 (good to moderate) agricultural land surrounding these towns. Burley in Wharfedale will see creation of 200 new homes to meet local need through redevelopment of sites within the village and from some local green belt changes. <p>However, it is recognised that some development on green belt land is required in order to ensure development in sustainable locations and to ensure that the development needs of Ilkley, Addingham, Burley in Wharfedale and Menston are met.</p> <p>In order to mitigate the adverse impacts from the loss of greenfield land it is recommended that the policy references Strategic Core Policy SC7 in relation to green belt review and the application of the Sequential Approach to the allocation of land outlined in Strategic Core Policy SC5.</p>	<p>Move towards marginally (soil resources)</p> <p>M</p>

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>The following development has the potential to impact upon biodiversity and in particular on the South Pennine Moors SPA, SAC and SSI:</p> <ul style="list-style-type: none"> • There is the potential for new housing in Ilkley to have an effect upon biodiversity (e.g. disturbance, loss of habitat). Development of this area would involve the use of Green Belt, a large part of which falls within the South Pennine Moors SPA, SAC and SSSI. Large parts of the Green Belt are also designated as Bradford Wildlife Areas, and comprise ancient woodland. • There is the potential for new housing development in Burley and Menston to have an effect upon biodiversity (e.g. disturbance, loss of habitat). There are several Bradford Wildlife Areas, ancient woodland, and / or SEGIs within and / or in the area surrounding the towns and both brownfield and greenfield land can also support a range of habitats and species. Burley is within 1km of the South Pennine Moors SPA, SAC and SSSI. Menston is within 2km. • There is the potential for new development in Addingham to have an effect upon biodiversity (e.g. disturbance, loss of habitat). There are several Bradford Wildlife Areas, ancient woodland, and / or SEGIs within and / or in the area surrounding the town and both brownfield and greenfield land can also support a range of habitats and species. Addingham is within 2km of the South Pennine Moors SPA, SAC and SSSI. <p>In addressing the above potential effects, the policy seeks to protect and enhance the integrity and mosaic of moorland habitats, of Ilkley and Rombolds Moor and areas of importance to the North Pennine Moors SPA/SAC and SSI resulting in a positive contribution. No specific mention is made of ensuring the sites are protected from land use and public access, which is particularly important in light of the HRA undertaken and the recommendation for mitigation zoning around this designation. However, the policy is also read in conjunction with Policy SC 8 which is explicit that development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the South Pennine Moors Special Protection Area and Special Area of Conservation and does set out the requirements for development within the identified zones of influence.</p> <p>The policy also includes a requirement to improve and enhance the role of the River Wharfe as a key infrastructure corridor and the ecosystem services it provides. The policy also recognises the importance of field patterns, tree cover and the wider context of moorland, river and woodland in habitats for a diverse range of species. This will have positive impacts upon this objective but does not mitigate the potential adverse impacts from land use and access on the South Pennine Moors and so overall there are minor negative impacts.</p> <p>The policy wording could be improved through specific mention of land use and public access impacts on the national and internationally designated sites, since the latter are likely to be the key issues associated with new housing and the resulting increased population in Ilkley and other Wharfedale towns on the South Pennines SPA, SAC and SSSI.</p>	+

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
6. Maintain and enhance the character of natural and man made landscapes	<p>Overall, the policy seeks to protect and enhance landscape character in Wharfedale, , and recognises the importance of field patterns, tree cover and the wider context of moorland, river and woodland in habitats for a diverse range of species and contributing towards Wharfedale’s distinctive character, resulting in a positive contribution, but this does not mitigate the loss of Green Belt. The Green Belt contributes positively to the landscape character of the area. It also plays an important role in preventing urban sprawl and maintaining countryside character and openness. Infill development on open space, greenfield and Green Belt land is also likely to impact upon the visual amenity and sense of place of neighbouring residents:</p> <ul style="list-style-type: none"> • There are no landscape designations covering Ilkley. Notwithstanding this, new housing development in Ilkley is likely to result in the loss of greenfield land, including Green Belt given the policy wording ‘Ilkley will see the creation of 800 new homes in focused on urban redevelopment opportunities including a significant contribution from green belt changes in sustainable locations’. • There is the potential for new development on brownfield sites in Burley and Menston to have an effect upon the townscape. The effect will depend upon the scale and nature of the development. It is noted that brownfield development presents an opportunity to enhance the townscape (e.g. through the re-use of derelict sites and buildings). However, new housing development will involve a significant contribution from greenfield land. • There is the potential for new development on brownfield sites in Addingham to have an effect upon the townscape. The effect will depend upon the scale and nature of the development. It is noted that brownfield development presents an opportunity to enhance the townscape (e.g. through the re-use of derelict sites and buildings). However, new housing development will involve a significant contribution from greenfield land.. <p>The policy sets out provision for the creation of high quality employment land at Ilkley. This would potentially involve the loss of greenbelt land and would also raise issues in respect of the HRA and the suggested mitigation zoning for the South Pennine Moors SPA and SAC. However, any changes to the Green Belt would be subject to the selective Green Belt reviews identified in (SC7) and the need for such changes contingent on the application of the sequential approach to the allocation of land for development outlined in SC5.</p> <p>Consideration should be given as to whether a specific Green Belt release should be identified in the Core Strategy in relation to the proposal for high quality employment land at Ilkley, or whether such releases should be subject to further appraisal as part of later documents such as the Site Allocations DPD.</p>	-

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
7. Protect and enhance historic assets and their settings	<ul style="list-style-type: none"> There is the potential for new housing development in Ilkley to have an effect upon the character and setting of the Ilkley, Middleton and Ben Rhydding Conservation Areas and Listed Buildings within the town. The potential for unknown archaeology should also be taken into consideration. There is the potential for new housing and employment development in Burley and Menston to have an effect upon Listed Buildings and upon the character and setting of Conservation Areas within the towns; the potential for unknown archaeology to be present in all areas should also be taken into consideration. New housing in Menston could impact upon High Royds Historic Park and Garden. There is the potential for new housing development in Addingham to have an effect upon Listed Buildings and to affect the character and setting of Conservation Areas within these towns. The potential for unknown archaeology to be present in all areas should also be taken into consideration. <p>However, the policy seeks to conserve and enhance the designated and undesignated heritage assets which will have positive impacts upon this objective. The policy also seeks to recognise the importance of cultural associations and archaeological interest of Rombold's Ridge, which will also have significant positive impacts on this objective.</p> <p>The policy could be strengthened by the addition of 'protection' for the historic environment.</p>	++
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	<p>The development of 2,500 homes in Wharfedale should help to meet identified need in this area</p> <p>Policy HO11 states that the Council, subject to viability, negotiate for up to 30% affordable housing in Wharfedale and to ensure that there is an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, suitability and viability. This will help to enhance the positive impacts of the housing allocation for Wharfedale on this objective.</p> <p>Notwithstanding the requirements of Policy HO11, it is recommended that to ensure local needs are met the policy specifically mentions the need for affordable housing for the young and elderly – particularly sheltered housing in Burley and Menston and provision for first time buyers in Ilkley.</p> <p>Menston is proposed as growth area, there are no regeneration areas proposed.</p>	++
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	<p>Development in the following locations is considered to make a marginal positive contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a significant contribution towards this objective.</p> <ul style="list-style-type: none"> New housing in Ilkley would be able to access existing public transport services (bus and rail). Notwithstanding this, Ilkley is not served by a high frequency bus route, which may discourage bus use and trains on the rail line are at capacity during peak times 	+

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> • There is limited public transport service provision (i.e. no high frequency bus services) in Burley and Menston and trains on the rail line are at capacity during peak times. • There is limited public transport service provision (i.e. no high frequency bus services) in Addingham. <p>The following improvements to existing transport infrastructure are proposed:</p> <ul style="list-style-type: none"> • Improved public transport within and between Ilkley and Wharfedale towns including rail station, cycleway and PROW improvements. • Implement stronger demand management in Wharfedale. • Improve public transport access between Wharfedale, Airedale and the City of Bradford, Craven and Leeds. • Improve surface access and public transport access to Leeds Bradford International Airport by encouraging more direct public transport connections with Ilkley. <p>These improvements would increase accessibility and contribute positively to reducing congestion.</p> <p>It is recommended that the policy wording recognises that there is no high frequency (10 minute) bus service to Ilkley.</p>	

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	<p>Development in the following locations is considered to make an uncertain towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive effect:</p> <ul style="list-style-type: none"> • New housing in Ilkley may be able to access existing public transport services (bus and rail), local services / facilities and employment. These aspects help to reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling. However, Ilkley is not served by a high frequency bus route and trains on the rail line are at capacity during peak times. • New housing in Burley and Menston may be able to access existing public transport services, local services / facilities and employment. These aspects help to reduce the need to travel by car for certain journeys and encourage public transport use, walking and cycling. However, the area is not served by high frequency bus services, trains on the rail line are at capacity during peak times and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Addingham may be able to access existing public transport services, local services / facilities and employment. These aspects help to reduce the need to travel by car for certain journeys and encourage public transport use, walking and cycling. However, these areas are not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. <p>Overall the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective. However, in all cases there is the potential for new housing to exacerbate congestion, especially at peak times, which would need to be assessed.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	<p>?</p> <p>++</p>

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
11. Improve the quality of the built environment and make efficient use of land and buildings	<p>Overall, the policy seeks to protect and enhance landscape character in Wharfedale resulting in a positive contribution. However, the policy does make provision of land from green belt changes to facilitate development in sustainable locations', including:</p> <ul style="list-style-type: none"> • New development in Ilkley is likely to involve the development of greenfield land, including Green Belt. • New development in Burley and Menston is likely to involve the development of greenfield land, including Green Belt. • New development in Addingham is likely to involve the development of greenfield land, including Green Belt. <p>This will have minor negative impacts in relation to making efficient use of land.</p> <p>Land allocation will follow the sequential approach outlined in SC5 (priority to the re-use of deliverable and developable previously developed land and buildings provided that it is not of high environmental value, second priority to other greenfield opportunities within the settlement and third priority to Local Green Belt releases). Accepting that greenfield land will be needed, in order to deliver the most sustainable pattern of development, the use of the principles of the strategic policies will ensure that is allocated efficiently.</p> <p>Importantly the policy seeks to conserve and enhance the designated and undesignated heritage assets, which will have a significant positive contribution to the quality of the built environment.</p> <p>Some flexibility in affordable housing targets is also allowed to secure the most appropriate level and quality of development, which will further help to have positive impacts on the quality of the built environment.</p>	<p>-</p> <p>++</p>

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
12. Improve the quality and range of services available within communities and connections to wider networks	<p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective.</p> <ul style="list-style-type: none"> • New housing in Ilkley may be able to access local services / facilities, employment and existing public transport services (bus and rail) in the town, which connect Ilkley to the Sub Regional City. Notwithstanding this, Ilkley is not served by a high frequency bus route and trains on the rail line are at capacity during peak times. • New housing in Burley and Menston may be able to access existing public transport services and local services / facilities. However, it is not served by high frequency bus services and services / facilities provision is limited in these areas. Residents may therefore have to travel to access certain services / facilities elsewhere. • New housing in Addingham may be able to access existing public transport services and local services / facilities. However, these areas are not served by high frequency bus services and services / facilities provision is limited in these areas. Residents may therefore have to travel to access certain services / facilities elsewhere. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Notwithstanding this, the effect of an increase in population on existing service provision needs to be considered (i.e. whether there is sufficient capacity to meet demand).</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service provision improvements in relation to the phasing of housing and employment development. To achieve the improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	<p>?</p> <p>+</p>
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	Overall, the pattern of development will have a significant positive effect.	++

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
14. Create good cultural, leisure and recreation activities available to all	<p>Improvements to cycleways and PROW are identified that will have a significant positive effect.</p> <p>Improvements to the Green Infrastructure along the River Wharfe including informal recreation and public transport corridor are proposed.</p> <p>The Settlement Study indicates that there are a range of sports and recreation facilities in Ilkley and the policy proposes further community facilities (especially open space and recreation) to address deficiencies. The policy also seeks to protect and enhance the role of the River Wharfe in relation to informal recreation.</p> <ul style="list-style-type: none"> • The Settlement Study indicates that there are outdoor sporting facilities, parks and gardens, provision for children and teenagers and community facilities in Burley although there is some shortfall in play areas and open space. • The Settlement Study identifies a lack of parks and gardens and / or community facilities (allotments and amenity green space) in Menston. • The Settlement Study identifies a lack of parks and gardens and / or community facilities in Addingham. There is also a lack of provision for children and teenagers in Addingham. • It is unknown whether the development of land would result in the loss of leisure and recreation space (e.g. playing fields). The potential loss of leisure and recreation space in this area as a result of new development needs to be considered. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective. The effect of an increase in population on facilities provision also needs to be considered.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and community facility improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health , education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	+

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
15. Improve safety and security for people and property	<p>The potential effect of new development in Wharfedale upon this objective will depend upon the type and design of any new development.</p> <p>Mitigating flood risk will help to reduce the risk of flooding for people and property and improve community safety in this respect making a minor positive contribution towards this objective.</p> <p>The design policies in the plan will help to ensure that new development in the Wharfedale Sub Area is well designed and also there is a requirement to ensure that design of new developments minimises the chances of crime. This will help to have positive impacts on this objective.</p>	+
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	<p>Policy seeks to help connect disadvantaged communities to employment that will have a significant positive effect on well-being of the currently unemployed.</p> <p>Improvements to cycleways and PROW are identified.</p> <p>Improvements to the Green Infrastructure along the River Wharfe and public transport corridor are proposed.</p> <p>In addition, in terms of health care facilities, development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> • There are several doctors' surgeries, dental surgeries and pharmacies in Ilkley. • The Settlement Study indicates that there are more than one dental surgery, doctors' surgery and pharmacy in Menston and Burley. • The Settlement Study indicates that there is a doctors' surgery and pharmacy in Addingham but no dental surgery. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective. Notwithstanding this, the effect of an increase in population on existing healthcare provision needs to be considered (i.e. whether there is sufficient capacity to meet demand).</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service and health provision improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health , education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	+

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
17. Promote education and training opportunities which build the skills and capacity of the population	<p>Policy supports the role of the Education department in generating employment.</p> <p>Development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> • There are four primary schools, one secondary school and one further education facility in Ilkley. These facilities could be accessible from new housing development although there are concerns about capacity at Ilkley Grammar School; the policy also proposes additional school provision. • The Settlement Study indicates that there are 4 one or more primary schools in Burley and Menston, although there is concern about capacity at Menston Primary School. • The Settlement Study indicates that there are one or more primary schools in Addingham although there is concern about capacity. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Bradford's Education Authority does forward plan for schools looking at future demand for places (against current provision). Analysis of data on schools in this area suggests that there is spare capacity at present but that by 2019/20 there will be a shortfall in places against projected demand. There is also anecdotal evidence from the Ilkley Gazette which suggests that there is pressure on school places:</p> <p><i>'Current projections show there is a shortfall in places in the secondary phase in most parts of the District, and many primary planning areas are already, or are anticipated, to have a deficit in capacity in the next five years despite a significant programme of school expansion currently under way'</i></p> <p>(source: http://www.ilkeygazette.co.uk/opinion_opinion/opinion_opinion_letters/10213776.Letters_to_the_Editor)</p> <p>The effect of an increase in population on existing education provision and access to secondary schools in surroundings areas needs to be considered (i.e. whether there is sufficient capacity to meet demand). Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and education improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health , education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	+

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	<p>The high quality employment land proposed for Ilkley will help to create job opportunities for the town and have a positive impact upon this objective.</p> <p>The policy also supports the role of Ilkley Town Centre as a location for a mix of retail, leisure and office development on an appropriate scale and also supports the role of Burley in Wharfedale, Addingham and Menston for limited retail and leisure development. This will help to create job opportunities in these towns and make a positive contribution towards this objective.</p>	+
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	<p>The development of new housing and employment in Wharfedale should help to encourage further inward investment into this area. The high quality employment land proposed for Ilkley will help to attract inward investment and have positive impacts upon this objective, as will supporting the roles of Ilkley Town Centre, Burley in Wharfedale, Addingham and Menston for limited retail and leisure developments.</p>	+

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SA Objectives	Policy WD1 – Wharfedale Sub Area	
	Commentary	Scoring
<p>Summary:</p> <p>The policy will have a number of positive impacts, particularly in relation to climate change and air resources through the public transport improvements proposed, protection for the historic environment, and also for biodiversity. The policy seeks to enhance the role of the River Wharfe and recognises the importance of field patterns, tree cover and the wider context of moorland, river and woodland in habitats for a diverse range of species.</p> <p>The policy will also have positive economic impacts as the support for the roles of Ilkley Town Centre, Burley In Wharfedale, Addingham and Menston will help to create job opportunities in these areas and help to ensure that local needs are met.</p> <p>Whilst it has been identified that the new housing proposed for the Wharfedale Sub Area may have uncertain impacts in relation to transport, due to existing issues with the public transport in the Wharfedale Sub Area, the improvements to public transport should have a significant positive impact and will help to ensure that the new housing developed will be sustainable.</p> <p>Land use and public access impacts on the South Pennine Moors SPA, SAC and SSSI is a key consideration since the new housing and the resulting increased population in Ilkley and other Wharfedale towns could have adverse impacts on the South Pennines SPA, SAC and SSSI. However, through the approach taken in the policy itself as well as the overarching Strategic Core Policy SC8 any development that would have an adverse impact on the SAC/SPA would not be permitted and so no adverse effects should occur.</p> <p>The policy will have negative impacts in relation to making efficient use of land and landscape due to the need for green belt releases for new development. This could raise issues in respect of the HRA in relation to the suggested mitigation zoning for the South Pennine Moors SPA and SAC, though it is recognised that green belt releases are required in order to ensure development in sustainable locations. However, land allocation will follow the sequential approach outlined in SC5 (priority to the re-use of deliverable and developable previously developed land and buildings provided that it is not of high environmental value, second priority to other greenfield opportunities within the settlement and third priority to Local Green Belt releases). In addition and as mentioned above, the approach taken in this policy together with the measures in overarching Strategic Core Policy SC8 will ensure no adverse effects occur from new development.</p> <p>Mitigation:</p> <p>A number of considerations are set above in bold text as part of the appraisal of the policy against the SA objectives.</p>		

Policy PN1 South Pennine Towns and Villages Sub Area

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	<p>The policy does not make any specific mention of renewable energy, although it is recognised that policy EN6 promotes renewable and low carbon energy generation, supporting renewable energy generation targets and helping to reduce the need to generate energy from the burning of fossil fuels. The aims of policy EN6 will have significant positive impacts. However, the policy will also be read in conjunction with Strategic Core Policy SC2, and Housing Policy H09, which address carbon reduction, energy efficiency and housing design quality (including the use of sustainable design), which will mitigate to some extent the impacts of no direct reference in this policy to renewable energy generation.</p> <p>It is also noted that this area is very sensitive for renewable energy generation in light of the landscape character assessment and the findings of the HRA.</p> <p>Overall and in light of the wider policy framework in the plan given by Strategic Core Policy SC2, Environment Policy EN6 and Housing Policy HO9, impacts will not be negative.</p> <p>Reference could be made under the Environment section to use the opportunities provided by new development to maximise renewable energy generation and opportunities for energy efficiency, with due consideration give to the appropriateness of development given landscape character.</p>	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	<p>The new housing and employment land proposed in this policy will result in significant new development and as a result will generate waste. There is no specific mention of waste or measures to minimise waste generation</p> <p>In the policy although development would be in accordance with policy WM1 elsewhere in the Core Strategy.</p> <p>There is no specific mention of waste or measures to minimise waste generation.</p> <p>New housing development in the South Pennine towns should be able to access existing recycling facilities and kerbside collection services, which would help to have a minor positive impact upon this objective.</p> <p>Reference could be made under Environment to promoting waste minimisation and encouraging recycling within the South Pennine Towns and Villages in order to increase the sustainability of this policy option.</p>	+
3. Reduce the district's impact on climate change and vulnerability to its effects	<p>Travel by car may increase greenhouse gas emissions however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel.</p>	+

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<p>Development in the following locations contributes uncertainly towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned in relation to each location should help reduce the need to travel by car for short journeys and encourage the use of more sustainable modes of transport, thus helping to reduce greenhouse gas emissions from car travel - exhaust emissions:</p> <ul style="list-style-type: none"> • New housing in Queensbury, Thornton and Wilsden may be able to access existing public transport services (high frequency bus route), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited in these areas, residents may have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Cullingworth, Denholme, Harden, Haworth, Oakworth and Oxenhope may be able to access existing public transport services, local services / facilities and employment in the local area. However, these areas are not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
4. Safeguard and improve air, water and soil resources	<p>Travel by car may increase emissions to air however the policy seeks to ensure that strategic patterns of development maximise the opportunities to use non-car modes and reduce the need to travel.</p> <p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the Policy to address deficiencies that have been identified resulting in a positive contribution towards this objective. The aspects mentioned should reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling, and thus could help to reduce the effect of car travel upon local air quality:</p> <ul style="list-style-type: none"> • New housing in Queensbury, Thornton and Wilsden may be able to access existing public transport services (high frequency bus route), the cycle network, and local services / facilities and employment. Notwithstanding this, services / facilities provision and employment is limited in these areas, residents may have to travel by car to access certain services / facilities and employment elsewhere. • New housing in Cullingworth, Denholme, Harden, Haworth, Oakworth and Oxenhope may be able to access existing public transport services, local services / facilities and employment in the local area. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. <p>Overall, the pattern of development and public transport improvements to address deficiencies is considered to have an uncertain impact on this objective.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	?

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<p>Under the Environment section there is no mention of water resources or flood risk, despite the River Aire running through the north of Bradford, therefore an objective relating to protecting water resources and improving water quality and preventing/reducing and managing flood risk should be included as there is potential for new housing and employment development to impact upon local water quality and either be at risk of flooding or increase flood risk elsewhere in the catchment.</p> <p>Overall, given no objective relating to water quality and flood risk the pattern of development is considered to have a negative effect:</p> <ul style="list-style-type: none"> Queensbury is not located within the floodplain and there are no main watercourses in the proximity. Notwithstanding this, consideration should be given to the potential effect of any new development in this area upon the water quality of springs surrounding the town and upon flood risk elsewhere. Oakworth is not located in the floodplain and there are no main watercourses in the proximity. Notwithstanding this, consideration should be given to the potential effect of any new development in this area upon the water quality of springs surrounding the town and upon flood risk elsewhere. There is the potential for new development in Thornton to have an effect upon water quality and flood risk. Part of this town and / or the surrounding greenfield land lie within Flood Zones 2 and 3. There is the potential for new development in Cullingworth, Wilsden, Denholme, Oxenhope, Howarth and Harden, to have an effect upon water quality and flood risk. Parts of these Local Service Centres and / or the surrounding greenfield land lie within Flood Zones 2 and 3. Harden in particular is within or in close proximity to significant areas of floodplain. <p>There will be a loss of greenfield land/agricultural land in the following locations which will be required to deliver the number of houses proposed:</p>	-

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> Local Growth Centres of Queensbury and Thornton will between them see the creation of new employment and 1,700 new homes from sites within the urban area together with a significant contribution from green belt change in sustainable locations. However, new housing development in Queensbury and Thornton is unlikely to result in the loss of good quality agricultural land. Agricultural land surrounding these towns is graded as Grade 4. Depending upon the location of new development in Cullingworth, Harden and Wilsden, there is the potential for development to result in the loss of Grade 3 (good to moderate) agricultural land surrounding these towns. New development in Oxenhope, Haworth, Oakworth and Denholme is unlikely to result in the loss of good quality agricultural land. Agricultural land surrounding these towns is graded as Grade 4. <p>Overall, due to the loss of some greenfield/agricultural land there will be minor negative impacts upon this objective. However, it is noted that development on this land is required to ensure that development needs can be met.</p>	-
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>The policy seeks to protect and enhance the biodiversity and landscape character of the Pennine Uplands, Wilsden, Worth and North Beck Valley. The policy also seeks to protect the ecological integrity, the wilderness appeal and wide open skylines of the South Pennine Moors from adverse impacts, enhance the value and connectivity of upland fringe habitats and seek to manage pressure from visitors. The policy also requires that due to the close proximity of open moorland to the Pennine Towns and Villages that development must be sensitively managed. All of these measures will help to have a significant positive impact upon this objective.</p> <p>No specific mention is made in the policy of ensuring that sites are protected from land use and public access. In this respect, the policy promotes the tourism and leisure roles of Haworth and Thornton, which could have adverse impacts on the South Pennine Moors SAC and SPA (i.e. due to increased visitor pressure). However, it is noted that the policy seeks to manage visitor pressure on the South Pennine Moors, which would have positive impacts on this objective.</p>	++

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<p>There is the potential for new housing development in Queensbury and Thornton to have an effect upon biodiversity (e.g. disturbance, loss of habitat). There is a total of four Bradford Wildlife Areas, ancient woodland, and / or SEGIs within and / or in the area surrounding Queensbury and Thornton. Both brownfield and greenfield land can also support a range of habitats and species. Queensbury and Thornton are within 5km of the South Pennine Moors SPA, SAC and SSSI.</p> <p>There is the potential for new development in the Local Service Centres comprising the South Pennines towns and villages to have an effect upon biodiversity (e.g. disturbance, loss of habitat). There are several Bradford Wildlife Areas, ancient woodland, and / or SEGIs within and / or in the area surrounding the Local Service Centres. Both brownfield and greenfield land can also support a range of habitats and species. Haworth and Oxenhope are within 2km of the South Pennine Moors SPA, SAC and SSSI. Wilsden, Denholme, Cullingworth, Harden, Oakworth are within 5km. Given the HRA recommendations in terms of mitigation zoning around the South Pennine Moors there is potential for developments in these areas to have adverse impacts without appropriate mitigation. However, it is noted that the policy requires development to be sensitively managed, due to the close proximity of open moorland to the Pennine Towns and villages. This will help mitigate any adverse impacts of development and have positive impacts on this objective.</p>	++
6. Maintain and enhance the character of natural and man-made landscapes	<p>Overall, the policy seeks to protect and enhance landscape character (in particular of the Pennine Uplands, Wilsden, Worth and North Beck Valley), and also the cultural landscapes resulting in a positive contribution but this does not mitigate the loss of Green Belt. Green Belt contributes positively to landscape character. Green Belt also plays an important role in preventing urban sprawl and maintaining countryside character and openness. Infill development on open space, greenfield and Green Belt land is also likely to impact upon the visual amenity and sense of place of neighbouring residents:</p> <ul style="list-style-type: none"> • There is the potential for new development on brownfield sites in Thornton and Queensbury to have an effect upon the townscape. The effect will depend upon the scale and nature of the development. It is noted that brownfield development presents an opportunity to enhance the townscape (e.g. through the re-use of derelict sites and buildings). However, new housing development may also involve the use of Greenfield land, including Green Belt deletions in both towns. 	-

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> There is the potential for new development on brownfield sites in Oxenhope and Wilsden to have an effect upon the townscape. The effect will depend upon the scale and nature of the development. It is noted that brownfield development presents an opportunity to enhance the townscape (e.g. through the re-use of derelict sites and buildings). However, new housing development may also involve the use of Greenfield land, including Green Belt deletions in both towns. There is the potential for new development on brownfield sites in Cullingworth, Denholme, Harden, Haworth and Oakworth to have an effect upon the townscape. The effect will depend upon the scale and nature of the development. It is noted that brownfield development presents an opportunity to enhance the townscape (e.g. through the re-use of derelict sites and buildings). However, new housing development may also involve the use of Greenfield land, although no Green Belt deletions are proposed. <p>Overall, there will be a minor negative impact on this objective, due to the need for local greenbelt releases, although it is recognised that these are required to ensure that development needs are met.</p>	
7. Protect and enhance historic assets and their settings	<p>There is the potential for new housing development to have an effect upon Listed Buildings and upon the character and setting of Conservation Areas (with the exception of Denholme and Harden which are not designated Conservation Areas) covering all or part of the South Pennine towns. Queensbury is a good example of a Victorian era industrial village. The Black Dyke Mill buildings in the Brighthouse Road employment site in Queensbury are Grade II Listed. The potential for unknown archaeology to be present in all areas should also be taken into consideration. However, the policy seeks to conserve and enhance the heritage values of the Pennine Towns and villages, in particular the cultural associations of the Bronte Landscape and the dense patchwork effect of stone wall field boundaries and also those in the Haworth Conservation.</p> <p>Notwithstanding this, the tourism and leisure destination roles of Haworth and Thornton are promoted and so impacts on historic assets in these areas could be adversely affected (due to increased visitor pressure) resulting in an uncertain impact. However, it is noted that the policy promotes sustainable tourism in these areas that respects the Bronte Heritage, which will help to mitigate any adverse impacts from increased visitor pressure. The policy also requires that due to the close proximity of open moorland to the Pennine Towns and Villages and the significance of heritage assets development must be sensitively managed.</p> <p>Overall, the policy does seek to protect and enhance the historic environment in this area, which will have a minor positive impact on this objective.</p>	+

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	<p>The development of 3,400 new homes in the South Pennines towns and villages should help to meet identified need in this area.</p> <p>Policy H011 sets out affordable housing requirement and, subject to viability, the Council will negotiate up to 20% in towns, suburbs and villages. The policy states that affordable housing will be required on sites of 15 dwellings and more and on sites over 0.4hectares in size. This site size threshold is lowered to 5 dwellings in the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden and Cottingley. This will help to deliver affordable housing in the south Pennine Towns and Villages Area.</p> <p>The SHMA notes the level of affordable housing need for Queensbury and Thornton is equivalent to 25% of total need in the district. Housing affordability is a key issue in this area notably in Cullingworth, Haworth, Oakworth and Wilsden and this should be recognised in the policy text.</p> <p>Whilst it is noted that Policy H011 sets targets for affordable housing as informed by the SHMA, consideration should be given to whether the 20% requirement for towns, villages and suburbs is sufficient to meet need.</p>	+
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	<p>The policy requires that strategic patterns of development maximise the opportunities to use non car modes of transport and reduce overall need to travel and to improve public transport within and between the settlements of the South Pennines, with particular focus on bus improvements. The policy also seeks to implement stronger demand management in the Pennines and to improve public transport access between the South Pennine Towns and Villages, the City of Bradford and neighbouring Principal Town of Halifax, including cycle way and PRoW improvements. All of these measures will help to develop and maintain an integrated and efficient transport network for the South Pennine Towns and Villages.</p> <p>Development in the following locations is considered to make a marginal positive contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a significant contribution towards this objective.</p> <ul style="list-style-type: none"> • New housing in Queensbury, Thornton and Wilsden would be able to access existing public transport services (high frequency bus). • There is limited public transport service provision (i.e. no high frequency bus services) in Cullingworth, Denholme, Harden, Haworth, Oakworth, and Oxenhope. <p>The following improvements to existing transport infrastructure are proposed:</p> <ul style="list-style-type: none"> • Improved public transport within and between the South Pennine towns, in particular bus improvements. • Implement stronger demand management. 	++

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> Improve public transport access between the South Pennines, the City of Bradford and Halifax including cycleway and PROW improvements. <p>These improvements would increase accessibility and contribute positively to reducing congestion.</p>	
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	<p>The policy requires that strategic patterns of development maximise the opportunities to use non car modes of transport and reduce overall need to travel and to improve public transport within and between the settlements of the South Pennines, with particular focus on bus improvements. The policy also seeks to implement stronger demand management in the Pennines and to improve public transport access between the South Pennine Towns and Villages, the City of Bradford and neighbouring Principal Town of Halifax, including cycle way and PROW improvements. All of these measures will help to have significant positive impacts upon this objective.</p> <p>Development in the following locations is considered to make an uncertain towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive effect:</p> <ul style="list-style-type: none"> New housing in Queensbury, Thornton and Wilsden may be able to access existing public transport services (high frequency bus route), the cycle network, local services / facilities and employment. These aspects should reduce the need to travel by car for short journeys and encourage public transport use, walking and cycling. However, residents may have to travel by car to access certain services elsewhere. New housing in Cullingworth, Denholme, Harden, Haworth, Oakworth, and Oxenhope may be able to access existing public transport services, local services / facilities and employment. These aspects help to reduce the need to travel by car for certain journeys and encourage public transport use, walking and cycling. However, these areas are not served by high frequency bus services and local services / facilities provision and employment is limited in these areas. Residents may therefore have to travel by car to access certain services / facilities and employment elsewhere. <p>Overall the pattern of development and public transport improvements to address deficiencies that have been identified will make a significant positive contribution towards this objective. However, in all cases there is the potential for new housing to exacerbate congestion, especially at peak times, which would need to be assessed.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service improvements in relation to the phasing of housing and employment development. To achieve the improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	++

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
11. Improve the quality of the built environment and make efficient use of land and buildings	<p>The policy seeks to protect and enhance the landscape in the south Pennine Towns and villages, in particular of the Pennine Uplands, Wilsden, Worth and North Beck Valley, which will help to have positive impacts on this objective.</p> <p>There is support for economic diversification of settlements and the roles of Queensbury and Thornton as locations for a mix of community facilities, which will also help to have significant positive impacts upon this objective.</p> <p>However, development in the following locations will have minor negative impacts due to loss of greenfield land:</p> <ul style="list-style-type: none"> • New development in Queensbury and Thornton is likely to involve the development of greenfield land, including Green Belt. • New development in Oxenhope and Wilsden is likely to involve the development of greenfield land, including Green Belt. <p>No Green Belt deletions are proposed at Cullingworth, Denholme, Harden, Haworth, Oakworth.</p> <p>Overall, the policy seeks to protect and enhance landscape character in the South Pennine towns and villages resulting in a positive contribution. More importantly it policy seeks to conserve and enhance the heritage values of the South Pennine towns and villages which will have a significant positive contribution on the quality of the built environment.</p>	<p>++</p> <p>-</p> <p>++</p>
12. Improve the quality and range of services available within communities and connections to wider networks	<p>The policy supports economic diversification of settlements and supports the role of the centres of Queensbury and Thornton as locations for a mix of community facilities. This will improve the quality and range of services available within the communities in the south Pennine Towns and Villages, which will have a significant positive impact upon this objective.</p> <p>Development in the following locations is considered to make an uncertain contribution towards this objective as there is less opportunity to avoid travel by car but a number of public transport improvements are proposed by the policy to address deficiencies that have been identified resulting in a positive contribution towards this objective.</p> <ul style="list-style-type: none"> • New housing in Queensbury, Thornton and Wilsden may be able to access local services / facilities and the existing public transport network (high frequency bus route), which connect the towns to the Sub Regional City. Notwithstanding this, services / facilities provision is limited in these areas; residents may have to commute to access certain services / facilities elsewhere. 	+

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> New housing in Cullingworth, Denholme, Harden, Haworth, Oakworth, and Oxenhope may be able to access existing public transport services and local services / facilities. However, these areas are not served by high frequency bus services and services / facilities provision is limited in these areas. Residents may therefore have to travel to access certain services / facilities elsewhere. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>Notwithstanding this, the effect of an increase in population on existing service provision needs to be considered (i.e. whether there is sufficient capacity to meet demand).</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and service provision improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health , education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	Overall, the pattern of development will have a positive effect.	+
14. Create good cultural, leisure and recreation activities available to all	<p>Improvements to cycleways and PROW are identified that will have a significant positive effect, as will the restoration of Manywells country park, which will have a significant positive impact upon this objective. The policy also states that provision will be made open space and recreation facilities in a number of the local service centres, which will help to have a significant positive impact upon this objective.</p> <ul style="list-style-type: none"> The Settlement Study indicates that there are outdoor sporting facilities, parks and gardens, provision for children and teenagers and community facilities in Queensbury and Thornton, although there is a gap in allotment provision in Queensbury and limited facilities for young children and teenagers in Thornton. The policy identifies that community facilities, in particular provision of children and younger people and outdoor sporting facilities, are required. The Settlement Study indicates that there are outdoor sporting facilities, parks and gardens, provision for children and teenagers and community facilities in Denholme, Oxenhope, Haworth and Wilsden. The Settlement Study identifies a lack of community gardens in Cullingworth and Harden, a lack of parks and gardens in Cullingworth, and a lack of community facilities in Harden. 	+

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> The policy proposes the provision of community facilities including open space and recreational facilities in Cullingworth, Harden Haworth, Oakworth and Oxenhope to address current deficiencies. It is unknown whether the development of land would result in the loss of leisure and recreation space (e.g. playing fields). The potential loss of leisure and recreation space in this area as a result of new development needs to be considered. <p>Overall, the pattern of development and public transport improvements to address deficiencies that have been identified will make a positive contribution towards this objective.</p> <p>The effect of an increase in population on facilities provision also needs to be considered.</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and community facility improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p>	
15. Improve safety and security for people and property	The potential effect of new development in the South Pennine towns and villages upon this objective will depend upon the type and design of any new development. However, it is noted that the design policies in the plan include a requirement to minimise opportunities for crime through good design.	?
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	<p>Improvements to cycleways and PROW are identified, along with the restoration of Manywells country park, which will have positive impacts upon this objective. The policy also states that provision will be made for open space and recreational facilities in a number of the local service centres, which will also have positive impacts upon this objective.</p> <p>In addition, in terms of health care facilities, development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> The Settlement Study indicates that there are more than one dental surgery, doctors' surgery and pharmacy in Queensbury. The Settlement Study indicates that there is one pharmacy, dental surgery and doctor's surgery in Thornton. The Settlement Study indicates that there are dental surgeries, doctors' surgeries and pharmacies in Wilsden. Notwithstanding this, each Local Service Centre typically has one doctor's and dental surgery. 	+

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<ul style="list-style-type: none"> The Settlement Study indicates that there are no dental surgeries, doctors' surgeries or pharmacies in Oxenhope. There are also no doctors' surgeries in Harden and Oakworth, no dental surgeries in Cullingworth, Denholme, Harden, Haworth, and Oakworth. The policy proposes the provision of community facilities including health care facilities in Denholme, Harden, Haworth and Oxenhope to address current deficiencies. 	
17. Promote education and training opportunities which build the skills and capacity of the population	<p>Overall, the pattern of development will make a positive contribution towards this objective.</p> <p>Notwithstanding this, the effect of an increase in population on existing healthcare provision needs to be considered (i.e. whether there is sufficient capacity to meet demand).</p> <p>Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and health provision improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.</p> <p>The policy supports the economic diversification of settlements to retain local employment in the South Pennines, supports the role of the centres of Queensbury and Thornton as locations for a mix of community facilities and to promote tourism. The policy also states that local service centres will be allocated employment land in order to diversify the economies of these rural settlements. This will help to provide education and training opportunities through new employment and have positive impacts upon this objective.</p> <p>Development in the following locations is considered to make a positive contribution towards this objective:</p> <ul style="list-style-type: none"> The Settlement Study indicates that there are one or more primary schools, a secondary school and a further education facility in Queensbury. These facilities should be accessible from new housing development. The Settlement Study indicates that there are one or more primary schools in Thornton. The Settlement Study indicates that there are one or more primary schools in Denholme, Harden, Haworth, Oakworth and Wilsden. Cullingworth also has a secondary school. <p>Overall, the pattern of development will make a positive contribution towards this objective.</p> <p>Bradford Education Authority forward plans for schools and looks at future demand for schools places (against current provision). Shortfalls are predicted across the district by 2019/20 at existing schools. In light of this the effect of an increase in population on existing education provision and access to secondary schools in surroundings areas needs to be considered.</p>	+

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	Reference could be made in the policy or elsewhere in the Core Strategy to the phasing of public transport and education improvements in relation to the phasing of housing and employment development. To achieve an improved score and more sustainable outcomes, improvements in public transport and in deficiencies in health, education and open space provision would need to be addressed prior to significant housing or employment development taking place.	
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	<p>The policy supports the economic diversification of settlements to retain local employment in the South Pennines, supports the role of the centres of Queensbury and Thornton as locations for a mix of community facilities and to promote tourism. This will help to create jobs and have significant positive impacts on this objective.</p> <p>The policy also states that local service centres will be allocated employment land in order to diversify the economies of these rural settlements, which will also help to have significant positive impacts upon this objective.</p>	++
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	The development of new housing in the Local Service Centres may help to encourage further inward investment into these areas. Notwithstanding this, the policy only provides for enough new development to meet local need, which could potentially affect the viability of the Local Service Centres in the South Pennines, particularly those furthest from the Sub Regional City and proposed new employment development (e.g. such as Haworth and Oxenhope) although tourism development is supported.	?
<p>Summary:</p> <p>The policy will have a number of positive impacts on the South Pennine Towns and Villages. The policy will help to manage visitor pressure, which has positive impacts in relation to biodiversity and the historic environment, both of which are very important considerations for this sub area. The policy also seeks to protect the ecological integrity of the South Pennine Moors and to sensitively manage development in the South Pennine Towns and villages due to close proximity to open moorland, which will have significant positive impacts on SA objective 6.</p> <p>The policy promotes sustainable tourism to help avoid adverse impacts on the Bronte landscape and seeks to conserve and enhance the designated and undesignated heritage assets in particular those in Haworth, all of which will help to have significant positive impacts on SA objective 7.</p> <p>A number of public transport improvements are proposed including ensuring that strategic patterns of development maximise opportunities to use non car modes of transport, to improve bus services and to improve public transport access between the South Pennine Towns and Villages, the City of Bradford and neighbouring Principal Town of Halifax including cycleway and PRoW improvements, which will have significant positive impacts on SA objectives 9 and 10. There are also environmental and health benefits from these proposed improvements through helping to reduce vehicle emissions and improving cycleway and PRoW which will help to encourage walking and cycling.</p>		

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SA Objectives	Policy PN1 – South Pennine Towns and Villages Sub Area	
	Commentary	Scoring
	<p>The policy has positive economic impacts in relation to training and jobs through supporting the economic diversification of settlements to retain local employment in the South Pennines and supporting the role of the centres of Queensbury and Thornton as locations for a mix of community facilities and to promote sustainable tourism.</p> <p>There are some adverse impacts in relation to water and soil resources and making efficient use of land and buildings due to some loss of greenfield and agricultural land, although it is recognised that is required in order to meet development needs and to ensure development in sustainable locations.</p> <p>Mitigation:</p> <p>It is recommended that an objective relating to protecting water resources and improving water quality and preventing/reducing and managing flood risk is included, given that the River Aire runs through the north of Bradford.</p> <p>Consideration should be given whether there will be enough affordable housing provided for the South Pennine Towns and Villages in order to ensure that need is met.</p> <p>Consideration should be given as to whether the policy should include support for the role of the health authority and education authority given that they could be important sources of employment for this area. This could also have positive impacts in relation to health and well-being.</p> <p>Consideration should also be given as to whether all local service centres should all receive new open space and recreation facilities to ensure health benefits from this for the South Pennine Towns and Villages are maximised.</p>	

Policy EC2 Supporting Business and Job Creation

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SA Objectives	Policy EC2 – Supporting Business and Job Creation	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	No effects are anticipated.	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	No effects are anticipated.	0
3. Reduce the district's impact on climate change and vulnerability to its effects	No effects are anticipated.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EC2 – Supporting Business and Job Creation	
	Commentary	Scoring
4. Safeguard and improve air, water and soil resources	<p>As stated in revised text for policy SC7, “<i>The plan under Policy EC3 identifies a new land supply of at least 135 hectares needs to be allocated which includes at least 84 hectares of new land currently not within the known supply. To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.</i>” large sites in good market locations which are not available within the land supply in non green belt locations. This therefore means that a mixture of known and unknown land will be developed for economic development and it will involve the development of greenfield and brownfield land both of which can have value in terms of soil and water resources.</p> <p>It is recognised that loss of greenfield land would adversely impact upon water and soil resources which would have a minor negative impact upon this objective.</p> <p>It is only criterion B5 of the policy that allows for other new sites for employment uses to come forward</p> <p>Updated supporting information for this policy is provided in paragraph 5.1.16 which states that</p> <p><i>“the Employment Land Reviews incorporated an assessment of the deliverability and potential market demand of the employment land within the Council’s employment land portfolio. This included remaining allocated employment sites from the Replacement Unitary Development Plan together with other sites which had planning backing such as an extant planning permission. The current employment land portfolio as determined at 1st April 2014 amounted to 116.03 hectares in total. This comprises of 106.68 hectares of land allocated in the Replacement Unitary Development Plan together with 9.35 hectares of land with other forms of planning backing such as planning permission. The assessment of this land indicates that, for the purposes of providing a new portfolio of employment land that will endure for the plan period and will secure opportunities for new investment and sustained economic growth, only 51.57 hectares are considered potentially suitable. Within the Bradford area, where the proposed allocation is at least 100 hectares, the current supply of potential good employment sites is 33.39 hectares, a shortfall 66.61. In Airedale, the supply is 18.18 hectares giving a shortfall of 11.82 hectares. There are no sites allocated in Wharfedale of reasonable market demand giving a requirement of 5 hectares. However, these figures will be re evaluated at Allocations stage when the details of all sites will be considered against a broad range of factors including competing demands for other land uses such as housing, infrastructure requirements, environmental impacts, and physical characteristics such as access.”</i></p> <p>Given as mentioned above, figures will be revaluated at allocations stage and the fact that all sites will be considered against a broad range of factors (including environmental) there remains an overall level of uncertainty at this stage in relation to impacts upon this objective.</p>	-/?

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SA Objectives	Policy EC2 – Supporting Business and Job Creation	
	Commentary	Scoring
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	As identified for objective 4 above, the revised text for Policy SC7 notes that a new land supply of at least 135 hectares needs to be allocated which includes <u>at least 84 hectares of new land currently not within the known supply</u> . To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations. This therefore means that a mixture of known and unknown land will be developed for economic development and it will involve the development of greenfield and brownfield land both of which can have biodiversity value, depending upon the nature conservation value of an individual site. Given that potentially 62% of the employment land (84ha of 135ha) will be located on former Green Belt land, it is likely that there will be negative impacts upon this objective. However it is recognised that the extent of any negative impacts would be dependent upon the nature conservation value of any land lost and implementation of mitigation measures e.g. habit creation measures taken by the developer. On this basis there will be a mixture of negative and uncertain impacts upon this objective as there remains some uncertainty over the scale of negative impacts upon this objective from loss of Green Belt land.	- / ?
6. Maintain and enhance the character of natural and man made landscapes	As identified above, there is potential for 84ha of Green Belt land to be lost to economic development and given that green belt land forms a key part of landscapes this would likely result in negative impacts upon this objective.	-
7. Protect and enhance historic assets and their settings	These sites comprise of a mixture of greenfield and brownfield sites, some of which could have value as part of the historic environment of Bradford. Due to the uncertainty of not knowing the exact value of known employment sites in terms of their historic environment value and the fact that	?
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	Increasing employment by at least 1,600 new jobs annually helps to ensure that more people have a low credit risk and so access to mortgages. In general income from a job will give people in Bradford more opportunity and choice of homes, whether that was rented or owned. This would result in significant positive impacts on this objective.	++
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	No effects are anticipated.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EC2 – Supporting Business and Job Creation	
	Commentary	Scoring
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	The policy supports the delivery of new jobs through a number of measures including implementing regeneration proposals in Airedale and Bradford, areas which are likely to be accessed by public and transport and possibly by walking and cycling, all of which would help reduce reliance on the car and contribute significantly positively towards this objective. The proposed locations for the employment sites are identified as marketable and it is considered that more marketable sites are those that are more accessible which would support this objective,	++
11. Improve the quality of the built environment and make efficient use of land and buildings	Employment development in Bradford City Centre would involve the use of previously developed land and redevelopment of existing buildings which would make a significant positive contribution towards this objective. However, as noted elsewhere it is considered that where necessary and in sustainable locations Green Belt releases for employment land constitutes an effect use of land and would also contribute positively towards this objective. Overall impacts upon this objective are considered to be significantly positive.	++
12. Improve the quality and range of services available within communities and connections to wider networks	No effects are anticipated.	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	The policy will not directly provide people with jobs, but does provide employment land, which if developed could provide employment. The extent to which this could influence the quality of neighbourhoods will depend upon where new jobs are located, the nature of the jobs and the skills required and the local labour markets ability to provide people for those jobs. The policy would provide the basis for which those who are employed in new jobs to improve the quality of their own lives but the extent to which it would help improve all neighbourhoods is uncertain.	?
14. Create good cultural, leisure and recreation activities available to all	No effects are anticipated.	0
15. Improve safety and security for people and property	No effects are anticipated.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EC2 – Supporting Business and Job Creation	
	Commentary	Scoring
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	Supporting the delivery of 1,600 new jobs annually will, providing that it is delivered, help to ensure a significant number of people have a job and access to regular income. Income level is a key determinant in health, and can in turn help to improve health and well being. The policy can make a significant positive contribution towards this objective.	++
17. Promote education and training opportunities which build the skills and capacity of the population	The policy seeks to ensure the deliverability of employment land and to implement regeneration proposals – with specific mention of Bradford Business Forest, Digital Airedale, and Buck Lane Technology Park. Regeneration of these areas will help provide training opportunities which would improve skills and contribute significantly positively towards this objective.	++
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	The policy seeks to ensure the delivery of employment land and therefore contributes significantly positively towards this objective.	++
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	The policy seeks to ensure the delivery of employment land and therefore contributes significantly positively towards this objective.	++

Summary:

The policy will have a number of positive impacts, mostly in relation to the economic objectives and also on health and well being and improving the quality of the built environment / making efficient use of land and buildings. The policy will help to support business and job creation which will increase job and training opportunities for the residents of Bradford, raise income levels and will help attract investment in Bradford.

The positive economic benefits of this policy will help the population of Bradford live in quality housing through increased income levels, whether through home ownership due to increased chances of obtaining a mortgage or money for renting. There will be positive impacts on SA objective 10 as the policy will help implement regeneration proposals in Airedale and Bradford, areas which are likely to be accessible by public transport.

There is a mixture of negative and uncertain impacts upon the environmental objectives given that there will be a significant amount of Green Belt land needed to meet economic development requirements. This will have a negative impact in relation to SA objective 6. There is uncertain impacts in relation to objectives 4, 5 and 7 given that the figures outlined in this policy will be revaluated at allocations stage and the fact that all sites will be considered against a broad range of factors (including environmental ones) and in acknowledgement that a significant amount of Green Belt land will be needed to meet economic development needs.

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EC2 – Supporting Business and Job Creation	
	Commentary	Scoring
<p>Mitigation:</p> <p>It is recommended either within wording of the policy itself or in the supporting text that explains the reasoning behind the 1,600 jobs as this figure is above the REM forecast and the historical trend for Bradford. It is recognised that the 1,600 figure is more aligned with the REM figure but this reference should be made explicit.</p> <p>It is also recommended that</p>		

Policy HO3: Distribution of Housing Requirement

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO3 – Distribution of Housing Requirement	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	Effects on this objective will be contingent upon other policies in the plan that will address specific design issues, including Strategic Core Policies 1 and 2 and Housing Policy H09. Assuming that delivery of new homes is in line with these policies, there will be positive impacts on this objective.	+
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	Construction of new homes will generate waste; However, through design specification in Policy H09 and the Code for Sustainable Homes this could be reduced, along with adoption of construction best practice methods, which would help to address waste arising from construction and encourage re-use of onsite aggregate etc.. Nevertheless, there will still be waste generated from the scale of housing and so there is a minor negative impact on this objective.	-
3. Reduce the district's impact on climate change and vulnerability to its effects	The policy will have significant positive impacts upon this objective since a significant amount of new housing is distributed to locations which have good access to public transport, which will help to reduce journeys by car.	++
4. Safeguard and improve air, water and soil resources	The construction effects of new homes in relation to the movement of materials by HGV could have negative impacts on this objective in relation to air. Given the scale of new housing proposed, there will therefore be negative impacts on this objective.	--
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	Impacts on this objective would depend upon the specific sites which are allocated for housing and what species/habitats may be present on those sites.	?
	It is however, noted that the amount of housing distributed to some areas has decreased due to the results of the HRA assessment, which includes buffer zones around the South Pennine Moors SAC/SPA boundary, including a restrictive policy of 400m and precautionary zones beyond this extending out to 7km from the boundary of the European sites, and which includes mitigation measures such as the provision of accessible natural greenspace. This will indirectly help to have a positive impact in relation to conserving wildlife species and habitats.	+
	In delivering the scale of development anticipated by the targets, a proportion will be located on greenfield, although Policy HO8 seeks to minimise the release of Green Belt land for housing, although it is noted that under Policy SC7, some 11,000 houses are still likely to be built on re-designated Green Belt land. Use of Green Belt land is likely to lead to some local adverse effects on biodiversity.	-
	Overall impacts are considered to be uncertain and can be better quantified when the details of specific sites come through in the Site Specific Allocations DPD and the Area Action Plans.	Uncertain

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO3 – Distribution of Housing Requirement	
	Commentary	Scoring
6. Maintain and enhance the character of natural and man made landscapes	In line with Policy SC7 there will be a considerable amount of new housing developed on Green Belt which would have minor negative impacts upon this objective given that the Green Belt forms an important part of landscapes.	-
7. Protect and enhance historic assets and their settings	Impacts upon historic assets will depend upon which specific sites are allocated for housing. Impacts are therefore uncertain at this stage and can be better quantified when the details of specific sites come through in the Site Specific Allocations Document and the Area Action Plans.	?
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	The policy sets out the distribution of housing requirement and not tenure/type so there will be no impacts on this objective. However, the policy does set housing allocations by town and settlement to meet the housing target in Policy HO1. In consequence, the policy will help to deliver a significant amount of new housing across Bradford during the plan period, which will increase the opportunity for people to live in quality housing and help to meet the diverse needs of the population of Bradford. This will have a significant positive impact upon this objective.	++
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	The policy relates to the distribution of housing and so there will be no significant impacts on this objective.	0
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	The exact location of specific sites allocated for housing will impact upon congestion/increase public transport. However, many of the settlements allocated for housing are in locations which are accessible by public transport and so it is considered that there will be a significant move towards this objective. In particular allocation of a significant amount of the new housing in the Regional City of Bradford will have significant positive impacts due to its good public transport links.	++
11. Improve the quality of the built environment and make efficient use of land and buildings	Impacts on the built environment/making use of efficient land and buildings will in part depend upon exactly which sites are allocated for housing and so there will be some uncertain impacts on this objective. Impacts be better quantified when the details of specific sites come through in the Site Specific Allocations Document and the Area Action Plans.	?
	This policy, in conjunction with others that address land use (Housing Policy HO6) and the quality of the built environment (Strategic Core Policy 2 and Housing Policy HO9) would seek to have positive effects in relation to making efficient use of land. However, Green Belt releases are required to deliver a significant amount of this new housing which may in some instances mean that Green Belt land is used in preference to PDL. In light of this and loss of Green Belt there will be an overall minor negative impact upon this objective.	-

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO3 – Distribution of Housing Requirement	
	Commentary	Scoring
12. Improve the quality and range of services available within communities and connections to wider networks	No effects are anticipated	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	The policy will help to deliver a significant amount of new housing across Bradford. This will help people to live in a better quality of home. In turn this will help to improve the quality of all neighbourhoods and have a minor positive impact on this objective.	+
14. Create good cultural, leisure and recreation activities available to all	No effects are anticipated	0
15. Improve safety and security for people and property	No effects are anticipated	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	No effects are anticipated	0
17. Promote education and training opportunities which build the skills and capacity of the population	There is potential for the construction of new homes to provide training and apprenticeship opportunities with firms who are completing the work. It will however be dependent on the approach to training taken by the companies as to whether such opportunities will be provided in practice and so impacts at this stage are uncertain.	?
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	There is potential for the 42,100 homes (around 2530 per annum - which is considerably above what has been delivered in previous years) to provide employment through the construction industry and other sectors. However, the extent to which these jobs will be taken up by the local community will reflect the skills in the labour market and employment practices of construction firms and so impacts on this objective are uncertain.	?

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO3 – Distribution of Housing Requirement	
	Commentary	Scoring
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	No significant impacts on this objective.	0
<p>Summary:</p> <p>The policy has a mixture of positive and negative and also some uncertain impacts. In delivering the scale of housing anticipated by the targets there will inevitably be a proportion of which are located on greenfield land, which scores negatively against SA objective 11 in relation to making efficient use of land. It is however recognised that Policy H08 seeks to minimise this. The construction impacts of delivering the new homes has some minor negative environmental impacts on SA objectives 2 and 4.</p> <p>The policy moves significantly towards SA objective 10 since the distribution of housing sees a lot of housing allocated to areas where there is good access to public transport, in particular with regards to the allocation of a significant amount of new housing in the Regional City of Bradford, which has a good public transport network and also for the Principal Towns. This will compliment the economic objectives of the plan in relation to these areas, which are identified as a focus for economic growth.</p> <p>New housing in Keighley, Shipley, Ilkley and Bingley may be able to access existing public transport services (rail and / or high frequency bus), the cycle network, services / facilities and employment, which will have positive impacts with regards to helping ensure that housing development in these areas is sustainable.</p> <p>The policy also moves significantly towards SA objective 3 as a significant amount of new housing is located in areas which have good access to public transport and so will help to reduce journeys by car and in turn reduce vehicle emissions.</p> <p>The policy has uncertain impacts on the economic objectives. There is potential for the delivery of the new homes proposed throughout the plan period to offer training opportunities and job opportunities through the construction works. However, that would dependent upon the approach taken to training by housing developers and the skills of the local labour market.</p> <p>It should also be noted that the policy is in accordance with the NPPF, which seeks to deliver a wide choice of high quality homes and to boost significantly the supply of housing. The allocation of a large amount of the new housing in locations with good access to public transport will also accord with the NPPF's presumption in favour of sustainable development.</p>		
<p>Mitigation:</p> <p>None</p>		

Policy HO4 Phasing the Release of Housing Sites

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO4 – Phasing the Release of Housing Sites	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	No effects are anticipated	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	No effects are anticipated	0
3. Reduce the district's impact on climate change and vulnerability to its effects	No effects are anticipated	0
4. Safeguard and improve air, water and soil resources	No effects are anticipated.	0
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	The policy could have minor positive impacts on this objective through lessening the cumulative effects of housing activity in anyone period of time and helping to reduce cumulative impacts on sensitive ecological sites.	+
6. Maintain and enhance the character of natural and man-made landscapes	The policy would have minor positive impacts on this objective since phased released of land would provide time for communities to adjust to changes in development from new housing development. Nevertheless, this would need to be offset with the policy provision to enable the early release of subsequent phases to address any persistent shortfall in seeking to maintain a 5 year housing supply.	+
7. Protect and enhance historic assets and their settings	No effects are anticipated	0
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	The policy seeks to ensure that within each phase that the sites allocated for housing will provide for a range and choice of dwellings of different types, sizes and tenures which will meet local need. This will make a significant contribution towards this objective. Furthermore, there is the provision to bring forward large or complex sites where it is advantageous to do so.	++

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO4 – Phasing the Release of Housing Sites	
	Commentary	Scoring
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	No effects are anticipated	0
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	No effects are anticipated.	0
11. Improve the quality of the built environment and make efficient use of land and buildings	The policy states the need to meet brownfield land targets, which would be efficient use of land and to not undermine proposals for urban regeneration within the Regional City of Bradford and in Keighley. This may well involve re-using land and buildings which would contribute significantly towards this objective, in relation to making efficient use of land.	++
12. Improve the quality and range of services available within communities and connections to wider networks	No effects are anticipated	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	No effects are anticipated	0
14. Create good cultural, leisure and recreation activities available to all	No effects are anticipated	0
15. Improve safety and security for people and property	No effects are anticipated	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	No effects are anticipated	0
17. Promote education and training opportunities which build the skills and capacity of the population	No effects are anticipated.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO4 – Phasing the Release of Housing Sites	
	Commentary	Scoring
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	No effects are anticipated	0
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	No effects are anticipated	0
<p>Summary:</p> <p>The phasing release of land and maintaining a 5 year supply of housing are administrative requirements for Bradford and so do not impact on the majority of the objectives. There are however, positive impacts for Bradford in relation SA objectives 5 and 6 since phased released of land for housing will have positive impacts in relation to ecology through reducing the cumulative impacts of construction and will also allow communities to adjust to changes in the landscape resulting from new housing developments. Nevertheless, this would need to be offset with the policy provision to enable the early release of subsequent phases to address any persistent shortfall in seeking to maintain a 5 year housing supply.</p> <p>The policy states the need to ensure that within each phase of release, the sites allocated will provide for a range and choice of dwellings of different types, sizes and tenures which will meet local need. This will help to ensure the population of Bradford has access to quality and therefore has significant positive impacts on SA objective. There are also positive impacts upon SA objective 11 relating to efficient use of land through the stated need in the policy to meet targets for development on brownfield land.</p> <p>It is noted that the policy is in accordance with NPPF, in particular with regards to the need to maintain a 5 year supply of deliverable sites.</p>		
<p>Mitigation:</p> <p>None.</p>		

Policy HO12 Gypsies, Travellers and Travelling Showpeople

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO12 – Gypsies, Travellers and Travelling Showpeople	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	No effects are anticipated	0.
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	No effects are anticipated	0
3. Reduce the district's impact on climate change and vulnerability to its effects	No effects are anticipated	0
4. Safeguard and improve air, water and soil resources	The policy requires that sites allocated for gypsy and travellers and travelling showpeople will be assessed against criteria including the avoidance of significant adverse impacts on the environment and so will have a minor positive impact overall on this objective.	+
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>The policy sets out the criteria for assessing potential gypsy and traveller and travelling showpeople against and this includes the avoidance of significant adverse effects on the environment and adjacent land uses which should help towards meeting this objective.</p> <p>The policy states that criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the greenbelt. This requirement also has positive impacts on this objective.</p> <p>Overall it is considered that there will be minor positive impacts upon this objective.</p>	+
6. Maintain and enhance the character of natural and man-made landscapes	The policy requires that sites allocated for gypsies and travellers will avoid significant adverse impact on the environment and adjacent land uses and to incorporate appropriate design and landscaping standards. This will help to maintain and enhance the character of natural and man made landscapes and make a minor positive contribution towards this objective.	+
7. Protect and enhance historic assets and their settings	The policy requires that sites allocated for gypsies and travellers will avoid significant adverse impact on the environment and adjacent land uses. This will help towards protecting historic assets and their settings. Overall though it is considered that there will be no significant impacts on this objective.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO12 – Gypsies, Travellers and Travelling Showpeople	
	Commentary	Scoring
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	Major positive impact on this objective as it provides dedicated sites for minority groups of society and will allow them to live in the housing/accommodation of their choice.	++
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	No effects are anticipated	0
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	The policy requires potential sites for gypsy and traveller and travelling showpeople to be accessible by public transport which would help to reduce congestion and pollution. The effect of that is considered minor so overall impacts are neutral. In addition the policy states that the Council will work closely and constructively with the neighbouring councils, the traveller and showperson's communities and the settled community to identify the most appropriate sites which will offer locations and accommodation which are sustainable. This will further help to ensure use of sustainable modes of transport but as previously noted effects are considered to be minor and so overall impacts are neutral.	0
11. Improve the quality of the built environment and make efficient use of land and buildings	The policy requires good design standards for sites proposed for gypsy and traveller and travelling showpeople which will help to improve the quality of the built environment and make a minor positive contribution towards this objective. Furthermore, the policy states that criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the greenbelt. This requirement also has positive impacts on this objective.	+
12. Improve the quality and range of services available within communities and connections to wider networks	No effects are anticipated	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	The policy seeks to provide sites for a minority group of society so makes a significant positive contribution towards this objective.	++
14. Create good cultural, leisure and recreation activities available to all	No effects are anticipated	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO12 – Gypsies, Travellers and Travelling Showpeople	
	Commentary	Scoring
15. Improve safety and security for people and property	No effects are anticipated	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	The policy will provide dedicated sites for minority groups of society and so will help to improve health and well being for these groups and make a minor positive contribution towards this objective.	+
17. Promote education and training opportunities which build the skills and capacity of the population	No effects are anticipated	0
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	No effects are anticipated	0
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	No effects are anticipated	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy HO12 – Gypsies, Travellers and Travelling Showpeople	
	Commentary	Scoring

Summary:

The policy has a number of positive impacts, particularly in relation to the environmental SA objectives since the policy seeks to avoid significant adverse effects on the environment from the allocation of sites for travellers and travelling showpeople. The policy also seeks to avoid any adverse impacts from rural exception sites, which will also have positive impacts on the environment.

The policy moves significantly towards SA objective 13, since the policy seeks to provide for a minority group of society, which will help to provide social cohesion.

It should be noted that the policy is in accordance with the NPPF which requires that

'Local Planning Authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area. The LPA should

a) identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets

b) identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15

Criteria should be set to guide land supply allocations where there is identified need.

Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally.'

Mitigation:

None Required.

Policy EN2 Biodiversity and Geodiversity

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EN2 – Biodiversity and Geodiversity	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	No effects are anticipated	0
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	No effects are anticipated	0
3. Reduce the district's impact on climate change and vulnerability to its effects	No effects are anticipated	0
4. Safeguard and improve air, water and soil resources	The policy contributes significantly positively towards this objective since sites of ecological and geological importance will be protected from adverse impacts which will help contribute towards safeguarding air, water and soil resources.	++
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<p>The policy makes a significant positive contribution towards this objective as it seeks to protect biodiversity and geodiversity within the District and to identify principles for enhancing the overall biodiversity resource and stemming losses.</p> <p>The policy requires that any development likely to have a significant effect on the South Pennine Moors SPA and SAC will be subject to assessment under the Habitats Regulations at application stage. . If it cannot be ascertained that there will be no adverse effects on site integrity then the project will be refused unless the derogation tests of Article 6(4) Habitats Directive can be met.</p> <p>The policy also sets out that any proposed development likely to have an adverse effect on a SSSI should not normally be permitted unless in exceptional circumstances where the benefits of the development clearly outweigh the impacts both on the SSSI itself and any broader impacts on the national network of SSSIs.</p> <p>The policy requires appropriate mitigation for any development which will have adverse impacts upon designated sites and also sets out enhancement measures for habitats and species outside of designated sites which may be affected by new developments.</p>	++

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EN2 – Biodiversity and Geodiversity	
	Commentary	Scoring
	<p>Furthermore, Strategic Core Policy SC8 provides specific details on presumption against any development which would lead to an adverse impact upon the South Pennine Moors SAC and SPA. This policy also includes a zonal approach to managing development within the identified buffer zones. In conjunction with this policy, this will help to have significant positive impacts on this objective.</p> <p>All of these measures will have significant positive impacts upon this objective.</p>	
6. Maintain and enhance the character of natural and man made landscapes	The policy will make a significant positive contribution towards this objective. Sites of ecological and geological value are an inherent part of natural and man made landscapes and so the various measures in the policy to protect biodiversity and geodiversity will help to have a significant positive impact upon this objective.	++
7. Protect and enhance historic assets and their settings	No effects are anticipated.	0
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	No effects are anticipated	0
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	No effects are anticipated.	0
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	No effects are anticipated	0
11. Improve the quality of the built environment and make efficient use of land and buildings	No effects are anticipated.	0
12. Improve the quality and range of services available within communities and connections to wider networks	No effects are anticipated.	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	No effects are anticipated.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EN2 – Biodiversity and Geodiversity	
	Commentary	Scoring
14. Create good cultural, leisure and recreation activities available to all	No effects are anticipated	0
15. Improve safety and security for people and property	No effects are anticipated	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	No effects are anticipated	0
17. Promote education and training opportunities which build the skills and capacity of the population	No effects are anticipated.	0
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	No effects are anticipated	0
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	No effects are anticipated	0
<p>Summary:</p> <p>Policy EN2 seeks to protect biodiversity and geodiversity within the District and to identify principles for enhancing the overall biodiversity resource and stemming losses. It identifies a range of factors that need to be taken into account in identifying potential land for development and in managing proposals that come forward.</p> <p>The policy has significant positive impacts in relation SA objective 5 since the policy affords protection for the South Pennine Moors SPA and SAC through a requirement that any development affecting this designation is subject to Habitats Regulations Assessment. . Furthermore, the policy also affords protection to SSSIs. This policy is also important in light of the HRA undertaken in support of the Core Strategy and the recommendation for mitigation zoning around the North and South Pennine Moors SAC, SPA and SSSI.</p> <p>The policy does not permit development on important biodiversity or geodiversity sites unless there are overriding reasons for the development to go ahead. In such cases, the policy requires appropriate mitigation measures. The policy seeks to protect locally designated sites and habitats and species outside of designated sites. All of these measures will help to have significant positive impacts in relation to biodiversity.</p>		

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy EN2 – Biodiversity and Geodiversity	
	Commentary	Scoring
	<p>The measures in the policy will also have a positive impact in relation to air, water and soil resources, which are a key part of biodiversity and on the landscape of Bradford.</p> <p>No significant effects are anticipated on the rest of the SA objectives.</p> <p>It should be noted that the policy is in accordance with the NPPF which seeks to conserve and enhance the natural environment, including a requirement to contribute to and enhance the natural and local environment and minimise impacts on biodiversity and geodiversity.</p>	
Mitigation:	None.	

Policy WM1: Waste Management

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy WM1: Waste Management	
	Commentary	Scoring
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	The policy seeks to ensure that waste arisings in the district are managed accordance with the principles of the waste management hierarchy and seeks to ensure increased capacity in facilities to move the district towards self sufficiency in the treatment of forecast future waste arisings. This will contribute to prudent resource use, as well as enabling the supply of energy generation from waste, where appropriate.	+
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	The policy directly encourages the minimisation of waste and its systematic management in accordance with the principles of the waste hierarchy.	++
3. Reduce the district's impact on climate change and vulnerability to its effects	Encouraging the prudent management of waste will help to contribute to climate change mitigation, for example through generating energy from waste.	++
4. Safeguard and improve air, water and soil resources	Adhering to the principles of the waste management hierarchy will help to protect air, water and soil resources across the District and in specific locations.	+
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	No significant impacts.	0
6. Maintain and enhance the character of natural and man made landscapes	No significant impacts.	0
7. Protect and enhance historic assets and their settings	No significant impacts.	0
8. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	No significant impacts.	0
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	No significant impacts.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy WM1: Waste Management	
	Commentary	Scoring
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	No significant impacts.	0
11. Improve the quality of the built environment and make efficient use of land and buildings	No significant impacts.	0
12. Improve the quality and range of services available within communities and connections to wider networks	No significant impacts.	0
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	No significant impacts.	0
14. Create good cultural, leisure and recreation activities available to all	No significant impacts.	0
15. Improve safety and security for people and property	No significant impacts.	0
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	No significant impacts.	0
17. Promote education and training opportunities which build the skills and capacity of the population	No significant impacts.	0
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	No significant impacts.	0
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	No significant impacts.	0

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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SA Objectives	Policy WM1: Waste Management	
	Commentary	Scoring
<p>Summary:</p> <p>Policy WM1 requires the management of waste in accordance with the principles of the waste hierarchy and therefore contributes significantly to SA Objective 2 relating to minimising the growth in waste and increasing re-use, recycling and recovery. The policy also requires the Council to provide a suitable network of facilities to deliver sustainable waste management within the District to accommodate future waste arisings and has regard to cross-boundary issues.</p> <p>Through the adoption of a positive approach to the management of waste, positive impacts of the policy can be expected in relation to the protection and use of natural resources (encouraging waste minimisation and recycling), whilst providing materials for energy generation.</p> <p>Impacts on the majority of the SA Objectives are considered to be neutral given the absence of a direct relationship with the policy.</p>		
<p>Mitigation:</p> <p>Not applicable.</p>		



Appendix B

Policy SC8 Options Appraisal



Appendix B to the Addendum to the Sustainability Appraisal Report of the Bradford Core Strategy – Post Examination Modifications

Introduction

Background

Reasonable alternatives

Options for appraisal

Appraisal of policy options against SA objectives

Conclusion

Introduction

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. This Appendix is attached to the Addendum presenting the findings of the SA of the proposed changes to the Council's Core Strategy.

Following the Examination in Public hearings on the Core Strategy in March 2015, as review work took place, the Inspector continued to identify for the consideration of the Council, guidance and decision making that could exercise an influence on the plan. One such item was the Court of Appeal Judgement of July 2015 regarding Wealden District Council's Core Strategy Local Plan Policy WCS12 (Biodiversity).

As a result of this Council officers have undertaken an appraisal of the options for the draft Core Strategy Policy SC8. Further information about the background to the issues raised, reasonable alternatives considered and the appraisal undertaken by Council Officers is set out below.

Background

The Court of Appeal Judgement regarding Wealden District relates to a zones of influence approach to the identification and delivery of mitigation measures, in relation to residential development in zones surrounding a European Site, in this case Ashdown Forest. Wealden Council's Policy identifies an outer zone which has the aim of ensuring that the European Site, (also an SPA and SAC), is protected from recreational pressures.

Strategic Core Policy 8, in Bradford's Core Strategy, Protecting the South Pennine Moors SPA and South Pennine Moors SAC has, in common with Wealdens Policy WCS12, a broad zones of influence approach and an outer zone with the aim of ensuring that the European Site is protected from recreational pressure. However, there are differences in relation to the details of policy wording and approach to options for mitigation.

Arguments set out in the Wealden Case focused on making more explicit the consideration of reasonable alternatives to the chosen policy approach to meet the requirements of Strategic Environmental Assessment. Whilst it is the role of the HRA to address the risk of adverse impacts on the integrity of the European Site and identify sufficient avoidance and mitigation measures to allow a conclusion to be reached that a plan will not result in adverse effects.

In relation to the stages of plan-making and sustainability appraisal, identifying and applying mitigation measures follows after the earlier stage of options appraisal. Appraisal of major options for the key policy areas addressed in the core strategy took place at the issues and options stage of the sustainability appraisal of the plan. Work on identifying mitigation measures through the HRA, based on the assessment, meant that the policy approach to mitigation was introduced at the publication draft stage of the plan.

The process of options appraisal as part of the sustainability appraisal process involved the assessment of, generally two, broad policy options against the 19 SA objectives identified. The likely significant effects of options were considered using the SA scoring system supported by a brief commentary. The SA scoring system is set out in the SA addendum at 2.3. Accordingly, this process has been used to consider reasonable alternatives to Strategic Core Policy 8, Protecting the South Pennine Moors SPA and South Pennine Moors SAC. The text of the policy is set out below.

Strategic Core Policy (SC8) Protecting the South Pennine Moors SPA and the South Pennine Moors SAC and their zone of influence

In this Policy:

- Zone A is land up to 400m from the South Pennine Moors Special Protection Area (“SPA”) and South Pennine Moors Special Area of Conservation (“SAC”) boundary;
- Zone B is land up to 2.5km from the SPA and SAC boundary; and
- Zone C is land up to 7km from the SPA and SAC boundary.

Subject to the derogation tests of Article 6(4) of the Habitats Directive, in all Zones development will not be permitted where it would be likely to lead, directly or indirectly, to an adverse effect (either alone or in combination with other plans or projects), which cannot be effectively mitigated, upon the integrity of the SPA or the SAC. In conducting the above assessment the following approach will apply:

- In Zone A no development involving a net increase in dwellings would be permitted unless, as an exception, the development and/or its use would not have an adverse effect upon the integrity of the SPA or SAC.
- In Zone B it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat for qualifying species of the SPA.
- In Zone C, in respect of residential developments that result in a net increase of one or more dwellings, it will be considered how recreational pressure on the SPA or SAC, that such development might cause, will be effectively mitigated. The mitigation may be:

(i) such that the developer elects to offer, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace and/or other appropriate measures; or

(ii) in the form of a financial contribution from the developer to:

1. the provision of additional natural greenspace and appropriate measures to deflect pressure from moorland habitats and the long-term maintenance and management of that greenspace;
2. the implementation of access management measures, which may include further provision of wardens, in order to reduce the impact of visitors;
3. a programme of habitat management and manipulation and subsequent monitoring and review of measures.

To mitigate impacts on the SPA and SAC due to the increase in population, an SPD will set out a mechanism for the calculation of the financial contributions, by reference to development types, the level of predicted recreational impact on the SPA or SAC, and the measures upon which such contributions will be spent.

Reasonable Alternatives

The SEA Regulations are clear that, although other options could be subject to consideration, only reasonable alternatives should be the focus of detailed

appraisal. In the context of the Wealden case, potential, theoretical options identified related to consideration of a different radius for zones and a different approach to mitigation.

Options relating to a different radius for zones were given some consideration through the HRA process, although to an extent this was implicit and the subject of internal debate, rather than made explicit. To be considered reasonable alternatives in the context of the HRA, options of having a different radius for zones would need to be supported as being fully capable of addressing the risk of adverse impacts on the integrity of the European Site. A summary of these considerations for each of the Zones identified in Strategic Core Policy 8 is set out below.

Zone A

The identification of the 400m zone is based on a range of urban edge effects that people and the proximity of urban development have on the conservation of heathland sites. Urban edge effects include fly-tipping, invasive species, wildfire and increased predation, in addition to trampling and erosion, from those living in close proximity to the site and the likelihood of increased emissions.

Investigation of a number of these impacts has taken place in the context of lowland heath, but impacts are considered likely to arise from urban development close to upland moorland, particularly where the edge of the moorland is relatively open. Some cross referencing has taken place in relation to a south pennines moorwatch website and anecdotal evidence in relation to confirming the incidence of impacts identified elsewhere in relation to the South Pennine Moors.

Further evidence is presented in the HRA Reports in relation to fire and the distance cats travel. The likelihood of fire occurring depends on the level of access and a centre of population being close to the moorland, with wildfire presenting a serious risk to ecological integrity. Analysis of recorded wildfires between 2000 and 2008 on the moors adjacent to Ilkley indicates that 20 out of 26 occurred within 1km of the urban boundary. Research has investigated the numbers of prey caught by cats and the average distances travelled from home would be just over 1km, with females generally travelling shorter distances.

Evidence was therefore presented that a zone of up to a kilometre could have been identified in relation to urban edge impacts. Consideration was given to the precedent of 400m identified in the context of lowland heath, since this had been identified broadly on the basis of human and pet behaviour and to the fact that the number and cumulative impacts of effects would be likely to reduce as the distance from the site increased. It was also considered that there was potential for the distances travelled from home to the site for both humans and pets to be less within a developed area, due to obstacles such as roads.

Accordingly, it was decided to identify a zone of 400m, as being the only reasonable option in practice to effectively avoid adverse impacts in close

proximity to the site. A key factor was the distance within which individual impact pathways and the accumulation of impacts meant that the application of mitigation measures was unlikely to prove successful.

Zone B

The vulnerability of SPA bird species to loss of foraging areas beyond the South Pennine Moors SPA site boundary was initially recognised in the 2012 bird survey work. Based on local knowledge at the time and discussions with West Yorkshire Ecology survey work took place within a distance of approximately 1km of the European Site.

More detailed work in relation to assessing the potential for loss of foraging areas took place as part of the Habitats Regulations Assessment of Bradford's Core Strategy, involving a literature search of work relating to the behaviour of individual bird species. In particular, this established that golden plover, a key bird species, fly an average distance of well over 2 kilometres to feed on fields and have a strong fidelity to fields and parts of a field. Females can travel significantly greater distances than males of up to approximately 7km.

The zone lying within 2.5km of the SPA was identified in the HRA Report as the area most frequently used by SPA qualifying species. In discussions it was considered that identifying a zone of below 2km would result in a significant risk of failing to take into account or identify foraging areas used by golden plover. Alternatively identifying an area based around the distances females travel could result in identifying significant areas of land for assessment, with gains tailing off towards the outer limit. Other figures would not therefore be considered to be reasonable options that should be subject to detailed appraisal.

Zone C

Post code data collected during visitor surveys was analysed to inform the identification of an approximate visitor catchment area. Distances between postcode origin and point of access to the SAC/SPA were calculated and used to generate a cumulative distribution curve. Natural England advised that the 75th percentile should be used as the upper threshold for determining a zone of influence for assessing recreational impacts on European sites, as this figure has been used in similar work initiated by other local authorities.

Using the threshold of the 75th percentile, a zone of influence extending to approximately 10.5km from the SAC/SPA boundary could have been identified. Analysis was then repeated to examine how far residents within Bradford district travel to reach the SAC/SPA, which showed that 75% of Bradford residents travelled from within approximately 5km to reach the South Pennine Moors SAC/SPA in summer 2013. The distribution curve then continues to climb to the 85th percentile where it levels off. This coincides with the 7km mark.

Taking an approximately average figure in relation to the 75th percentile for all visitors (10km) and Bradford residents (5km) also results in a figure of around

7km. Accordingly, this figure has been chosen as the outer extent of the zone of influence in relation to recreational impacts. This is also within the range identified in relation to visitor survey work that has taken place elsewhere in relation to visits to European Sites. Other figures are not considered to be reasonable options that should be subject to detailed appraisal.

Zones were therefore identified on the basis that other distances would not provide a reasonable option in the context of the need to respond fully to the risk of adverse impacts. Furthermore the particular zones identified were supported by both Natural England and the RSPB. In relation to identifying a different approach for individual zones, the rationale for Zone A is clear and the approach in relation to Zone B allows for a proportionate response to assessment, with Zone C allowing for options for mitigation measures but provides certainty that appropriate measures are identified.

Options for appraisal

Further possibilities in relation to the policy response need to be on the lines of generating a different response overall. Whilst a reasonable alternative could clearly not be that of having no policy response whatsoever, in the context of the impact pathways identified in the HRA, a minimum policy response might be considered to be that of having a policy based on a project by project assessment alone to assess and address the potential for adverse impacts on European Sites. The two alternatives of case by case assessment of proposals and retaining the current zones of influence policy are therefore considered and subject to assessment below.

Appraisal of policy options against SA objectives

The following table sets out the appraisal of two policy options, that of a policy requiring a case by case assessment and that of the current zones of influence approach set out in Policy SC8. The policy options are appraised using SA objectives and the SA scoring system. It is noted that predicting effects is challenging given the strategic nature of the plan and the SA objectives.

SA Objectives	Option of case by case assessment	Scoring	Option of current policy SC8	Scoring
1 Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	The South Pennine Moors are an important natural resource within the district and appraisal is on the basis of prudent use, but also relates to promoting renewable energy resources. A case by case assessment provides less certainty of prudent use in relation to addressing indirect and in-combination effects and fails to flag up issues early where conflicts could arise in relation to the promotion of wind energy and disturbance of foraging areas. An uncertain impact is therefore identified.	?	The current policy provides greater certainty of prudent use of this natural resource and by identifying at an early stage a need for assessment and awareness of the potential foraging resource within the 2.5km zone reduces the potential for conflict when considering locations for wind energy. A marginally positive impact on the objective is identified.	+
2 Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered.	No significant effects anticipated.	0	No significant effects anticipated.	0
3 Reduce the district's impact on climate change and vulnerability to its effects.	Uncertainty about impacts.	?	Could have a marginally positive impact on species and habitats of the SPA/SAC that could be vulnerable to the effects of climate change (due to a more strategic and co-ordinated approach) although too little information available to have an impact	?

			on scoring.	
4 Safeguard and improve air, water and soil resources.	Uncertainty about impacts.	?	In taking a strategic approach to mitigating combined impacts, of increased recreational pressure from development within the zone of influence, the policy should have a marginally positive effect on the peat soil resource and the avoidance of erosion.	+
5 Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats.	Although assessment would need to take place and would apply mitigation measures, where needed to avoid adverse effects, there would be less certainty that in-combination and indirect effects would be addressed through this piecemeal approach. Mitigation measures would only be identified at a planning application stage preventing strategic coordination of mitigation. Conservation of the European Site may be achieved, but enhancement would be less likely, and only a minor positive effect is therefore predicted.	+	In avoiding multiple urban edge effects in close proximity to the site, supporting land used by SPA birds for foraging and advocating a strategic approach to mitigating recreational impacts the policy would have a strongly positive impact on conserving and enhancing the European site. The zones of influence approach provides clarity about the approach and types of mitigation acceptable. A coordinated approach will better address the impacts of increases in recreational pressure and makes provision of additional natural greenspace more likely as a form of mitigation, which could contribute to the provision of species rich habitat.	++

<p>6 Maintain and enhance the character of natural and man-made landscapes.</p>	<p>Approach could lead to a financial contribution towards the provision and management of natural greenspace which could contribute towards landscape features but could also lead to site choices being made within zone B on the basis of habitat mitigation rather than contribution to landscape character. Uncertainty about impacts.</p>	<p>?</p>	<p>Approach could lead to a financial contribution towards the provision and management of natural greenspace which could contribute towards landscape features, but could also lead to site choices being made within zone B on the basis of habitat mitigation rather than contribution to landscape character. Uncertainty about impacts.</p>	<p>?</p>
<p>7 Protect and enhance historic assets and their settings.</p>	<p>No significant effects are anticipated.</p>	<p>0</p>	<p>No significant effects are anticipated.</p>	<p>0</p>
<p>8 To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources.</p>	<p>A case by case approach provides less clarity as developers would need to devise appropriate mitigation, or justify that mitigation was not required in liaison with the authority. There is a risk that project specific work at the planning application stage will establish that negative effects of the development (including in combination effects) on the SPA/SAC cannot be mitigated. This could be an arduous approach for developers who work on a smaller scale. Without strategic coordination of mitigation, it would be difficult for smaller</p>	<p>?</p>	<p>With a zones of influence approach, the overall strategy of focusing development on the regional city of Bradford will remain effective as the majority of land within the zones of influence, which are closer to the South Pennine Moors, lie within the outer district. The approach in Policy SC8 provides greater clarity and consistency for developers and other stakeholders and identifies issues at a relatively early stage. It identifies the geographic area within which mitigation is required and gives an indication of the nature of mitigation. In relation to</p>	<p>+</p>

	developments to demonstrate that mitigation would cover their projects contribution to in-combination effects. Uncertain impacts on delivery are predicted.		recreational pressure the policy allows for a range of mitigation measures. On the above basis, a minor positive impact is therefore identified.	
9 Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts.	No significant effects are anticipated	0	No significant effects are anticipated	0
10 Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by car.	No significant effects are anticipated	0	No significant effects are anticipated	0
11 Improve the quality of the built environment and make efficient use of land and buildings	No significant effects are anticipated	0	No significant effects are anticipated	0
12 Improve the quality and range of services available	No significant effects are anticipated	0	No significant effects are anticipated	0

within communities and connections to wider networks.				
13 Provide social cohesion, encourage participation and improve the quality of all neighbourhoods.	No significant effects are anticipated	0	No significant effects are anticipated	0
14 Create good cultural, leisure and recreation activities available to all.	A piecemeal approach at the planning application stage is considered far less likely to achieve improved provision of natural greenspace. Larger schemes might provide on-site provision, but the potential for a contribution from smaller schemes would be lost. The impact is therefore regarded as uncertain.	?	Strategic identification and coordination of improved provision of natural greenspace and access management would be more likely to be achieved which would have a small positive impact on this objective	+
15 Improve safety and security for people and property.	No significant effects are anticipated	0	No significant effects are anticipated	0
16 Provide the conditions and services to improve health and well-being and reduce	No significant effects are anticipated	0	Could have a marginally positive impact on health if improved provision of natural greenspace, but rather indirect so has not made a difference to scoring.	0

inequality to access and social care				
17 Promote education and training opportunities which build the skills and capacity of the population.	No significant effects are anticipated	0	No significant effects are anticipated	0
18 Increase the number of high quality job opportunities suited to the needs of the local workforce.	No significant effects are anticipated	0	No significant effects are anticipated	0
19 Support investment and enterprise that respects the local character and needs of Bradford and the wider area.	No significant effects are anticipated	0	No significant effects are anticipated?	0

Conclusion

The zones of influence policy approach set out in Policy SC8 would achieve more effective mitigation and the necessary degree of certainty to be able to conclude that the core strategy would not result in adverse impacts on the ecological integrity of the South Pennine Moors SPA and SAC. The location of the district and in particular, Airedale, Wharfedale and the South Pennine towns and villages in relation to the South Pennine Moors and in particular Rombalds Moor, which forms an island of upland heath, in conjunction with the levels of development proposed in the core strategy, require a strategic approach to mitigation measures and a high degree of certainty that in-combination effects can be addressed.

The zones of influence policy approach set out in Policy SC8 performs better in this detailed appraisal than the option of a case by case assessment. Improved outcomes are predicted to be achieved for SA objectives 1, 4, 5, 8 and 14.

