Local Development Framework for Bradford

# Sustainable Design Guide Supplementary Planning Document

## **Supporting Documents**

Statement of Consultation Statement of Sustainability Appraisal

October 2008





This document is one of a number that make up the Local Development Framework for the Bradford District. If you need the contents of this document to be interpreted or translated into one of the community languages or you require it in Braille, Large Print or on tape, please contact the Local Development Framework Group on (01274) 434050, (01274) 434544 or (01274) 434606.

આ દસ્તાવેજ ઘણાંમાં નો એક છે કે જે બ્રેડફર્ડ ડિસ્ટ્રકટ નાં સ્થાનિક વિકાસ ની રૂપરેખા બનાવે છે. જો તમને આ દસ્તાવેજનાં લખાણનું પ્રાદેશિક ભાષઓમાં ભાષંતર કરાવવાની અથવા તેનો અર્થ સમજવાની જરૂર જણાય, અથવા તમને તેની જરૂર બ્રેઈલ, લાર્જ પ્રિન્ટ કે પછી ટેપ ઉપર હોય, તો મહેરબાની કરી લોકલ ડિવેલપમેન્ટ ફ્રેમવર્ક ગ્રુપનો (01274) 434050, (01274) 434544 અથવા (01274) 434606 પર સંપર્ક કરો.

यह दस्तावेज़ उन बहुत से दस्तावेज़ों में से एक है जिनसे मिलकर ब्रैडफोर्ड डिस्ट्रिक्ट का लोकल डिवेलप्मेंट फ्रेमवर्क बनता है। यदि आप इस दस्तावेज़ की जानकारी का हिन्दी अनुवाद या इसे ब्रेल, बड़े अक्षरों या टेप पर प्राप्त करना चाहते हैं , तो कृपया लोकल डिवेलप्मेंट फ्रेमवर्क ग्रुप से (01274) 434050, (01274) 434544 या (01274) 434606 पर सम्पर्क करें।

ব্রাডফোর্ড ডিস্ট্রিক্ট (Bradford District) এর লোক্যাল ডেভেলাপমেন্ট ফ্রেইমওয়ার্ক (Local Development Framework – স্থানীয় উন্নয়ন কাঠামো) এর অনেকগুলো কাগজপত্র বা দলিলপত্রের একটি হলো এই তথ্যপত্রটি । এই তথ্যপত্রের বিষয়বস্তু কমিউনিটির লোকদের কোনো ভাষায় বুঝতে চাইলে অথবা লিখিত অনুবাদ চাইলে নতুবা তা ব্রেইলে (অন্ধলিপিতে), মোটা হরফে কিংবা ক্যাসেটে রেকর্ড করে চাইলে, অনুগ্রহ করে লোক্যাল ডেভেলাপমেন্ট ফ্রেইমওয়ার্ক গ্রুপ (Local Development Framework Group)-কে (01274) 434050, (01274) 434544 বা (01274) 434606 নাম্বারে ফোন করুন।

ید دستاویز بریڈفورڈ ڈسٹر کٹ کے مقامی تر قیاتی لائٹ میں سے متعلقہ دستاویز ات میں سے ایک ہے۔ اگر آپ کو اِس دستاویز کازبانی یاتح ایر کی ترجمہ سی بھی کمیونٹی زبان میں درکار ہویا آپ اِسے بریل، لارج پرنٹ یا شیپ میں چاہتے ہیں تو ہراہ مہر بانی لوکل ڈیویلی سنٹ فریم ورک گروپ سے ٹیلی فون نمبر :434544 434050, 01274 434606 بے 1274 434606 ہے 1274 پر ابطہ کریں۔

## CONTENTS

1.0	Staten	nent of Consultation	1
2.0	Stater	nent of Sustainability Appraisal	3
Арреі	ndices	:	
Apper	ndix 1:	Notice of Deposit	5
Apper	ndix 2:	Summary of Representations to Draft SPD	7
Apper	ndix 3:	Summary of Representations to Sustainability Appraisal Report	25
Apper	ndix 4:	List of Other Consultees	26

### **1.0 STATEMENT OF CONSULTATION**

- 1.1 The Sustainable Design Guide SPD provides advice on how new development can follow the principles of sustainable design and in doing so, assist the implementation of policies UDP3, UDP5, UDP8, UDP9, UR2, TM8, TM19, TM19A, D1, D2, D3, D5, D6, D7, D14, NE5, NR12, NR13, NR16, and P7 of the Replacement UDP (2005).
- 1.2 This Statement of Consultation has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004, and the summary of representations and the Council's response can be found in Appendix 2.
- 1.3 The draft SPD has been the subject of consultation, as resolved by Executive Committee on 1<sup>st</sup> November 2005. This consultation period ran from 10<sup>th</sup> November 2005 until 21<sup>st</sup> December 2005.
- 1.4 In line with the Regulations, and the Statement of Community Involvement (as submitted), the draft SPD and accompanying documents:
  - were made available at the Area Planning Offices in Bradford, Shipley and Ilkley, and at the Keighley Information Centre;
  - were made available at Central Bradford, Shipley, Bingley, Keighley and Ilkley libraries;
  - were available to download on the Council's website;
  - were posted to fifty-one statutory consultees, and a further fifty-two consultees were notified of the consultation period.

The consultation period was advertised in Bradford's local newspaper – Telegraph and Argus on 10<sup>th</sup> November 2005. The Legal Notice as advertised in the local press can be seen in Appendix 1.

1.5 The statutory consultees who received the draft SPD are listed below:

Addingham Parish Council	Cononley Parish Council
Borough of Pendle Council	Countryside Agency
Bradford Strategic Health Authority	Cowling Parish Council
Bradleys Both Parish Council	Craven District Council
British Telecom	Cullingworth Parish Council
Calderdale Metropolitan Borough Council	Denholme Town Council
City of Wakefield M D C	Denton Parish Council

Sustainable Design Guide Supplementary Planning Document – Supporting Documents

Draughton Parish Council	Nesfield-with Langbar Parish Council
Drighlington Parish Council	Network Rail
English Heritage	North Yorkshire County Council
English Nature	Otley Town Council
Environment Agency	Oxenhope Parish Council
Farnhill Parish Council	Silsden Town Council
Gildersome Parish Council	Steeton with Eastburn Parish Council
Glusburn Parish Council	Sutton-in-Craven Parish Council
Government Office for Yorkshire & The	Telewest Communications
Humber	Transco (North of England)
Harrogate District Council	Trawden Forest Parish Council
Haworth, Cross Roads & Stanbury Parish	West Yorkshire Passenger Transport
Council	Executive & Authority
Highways Agency	Wadsworth Parish Council
Ilkley Parish Council	Weston Parish Council
Keighley Town Council	Yorkshire and Humber Assembly
Kirklees Metropolitan Council	Yorkshire Electricity
Lancashire County Council	Yorkshire Forward Regional Development
Laneshaw Bridge Parish Council	Agency
Leeds City Council	Yorkshire Water Services Ltd
Middleton Parish Council	

- 1.6 A full list of all the other consultees can be found in Appendix 3.
- 1.7 A total of sixteen representations were submitted to the Council; these are set out in Appendix 2 along with the Council's response and proposed changes, if appropriate. A number of other changes have also been made for clarity and correction.
- 1.8 The majority of the respondents were in support of the SPD and saw it as a welcome and useful planning tool. Many of the suggested changes to the document involved increasing its scope, or making reference to other guidance or documentation. The document has been amended to reflect the comments made. Appendix 2 shows in which sections of the amended document the changes can be found.

#### 2.0 Statement of Sustainability Appraisal

#### Introduction

- 2.1 Article 9 of the European Directive (2001/42/EC), known as the Strategic Environmental Assessment (SEA) states that on adoption of a plan or programme (in this case a Supplementary Planning Document), a statement should be prepared setting out how environmental considerations have been integrated in to the Plan (the SPD). The statement should also include how the SPD has changed as a result of the appraisal process and the responses to the consultation; or why no changes were made. It should also include information on how the monitoring of the implementation of the document will be carried out.
- 2.2 This report satisfies the requirements of the European Directive and Government legislation and regulations as set out above.

#### Integration of Environmental Considerations

- 2.3 The Sustainability Appraisal is an iterative process, and continual appraisal of the effects of the SPD enables identification of areas where the SPD can be strengthened to ensure it achieves the sustainability objectives.
- 2.4. The Sustainability Appraisal process was undertaken during preparation of the SPD, and one representation was received concerning the Sustainability Appraisal.

#### Consultations

- 2.5 Consultation on the draft SPD and Sustainability Appraisal Report was carried out for six weeks between 10<sup>th</sup> November 2005 until 21<sup>st</sup> December 2005.
- 2.6 Sixteen representations were received on the draft SPD. One representation was received on the Sustainability Appraisal Report.
- 2.7 All comments have been analysed and the Council has provided a response to each one, as well as indicating any changes to the SPD. The summary of representations and details of the consultation can be found Appendix 2 at the end of this report.
- 2.8 Amendments were made to the SPD in response to comments made, but none were considered so great as to result in the document being reappraised.

#### Selection of the Adopted SPD

- 2.9 During the production of the SPD and Sustainability Appraisal, two options were considered, the first was production of the SPD, and the second was the "business as usual" approach.
- 2.10 If the SPD was not prepared, those involved in the determination of planning applications, would have to rely on the generality of national, regional and local planning policy. The absence of an SPD would adversely affect the implementation of the policies in the Replacement UDP, offer less certainty of stakeholders, and potentially undermine the Replacement UDP's objective of achieving sustainable design.
- 2.13 Adoption of the SPD would provide further information and guidance to all participants in the development control process and therefore help to implement twenty policies of the Replacement UDP.

#### Monitoring

2.14 Monitoring of the implementation of the SPD will be incorporated into the Annual Monitoring Report as part of the Local Development Framework. This Report will give an indication of the performance of the SPD and contains core indicators such as waste generation, specialist advice on design and renewable energy; however there is a need to establish monitoring arrangements for these indicators. It is anticipated that indicators/targets will be identified in the future. Effective monitoring will allow the Council to identify any issues with the SPD and will enable any work to improve the SPD to be carried out.

#### Conclusion

2.15 The Sustainable Design Guide Supplementary Planning Document has been prepared and has developed simultaneously with the sustainability appraisal of the effects of implementing the SPD. It has been concluded that its implementation will, overall, have a positive impact on achieving the sustainability objectives. Monitoring of the effects of the SPD will highlight any areas where it is felt the SPD is not working properly and is resulting in negative effects, and where review of the document is needed.

#### CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL

#### PLANNING AND COMPULSORY PURCHASE ACT 2004

# NOTICE OF DEPOSIT OF DRAFT SUPPLEMENTARY PLANNING DOCUMENT FOR PUBLIC COMMENT

#### SUSTAINABLE DESIGN

#### LOCAL DEVELOPMENT FRAMEWORK FOR THE BRADFORD DISTRICT

The City of Bradford Metropolitan District Council have published a draft Supplementary Planning Document called *Sustainable Design* for public comment. The Supplementary Planning Document provides guidance on how sustainable development principles can be applied to new development. The document applies District wide.

Copies of the Draft Supplementary Planning Document are available for inspection at the Council's Planning Offices at:

- Jacobs Well, Manchester Road, Bradford BD1 5RW (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Keighley Information Centre, Town Hall, Bow Street, Keighley BD21 3PA (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Shipley Town Hall, Kirkgate, Shipley BD18 3EJ (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Ilkley Town Hall, Station Road, Ilkley (Mon-Thurs 9am to 12.30pm & 1.30pm to 5.00pm, Fri 9am to 12.30pm & 1.30pm to 4.30pm)

And at the following libraries:

- Bradford Central Library, Princess Way, Bradford BD1 1NN (Mon-Fri 9am to 7.30pm, Sat 9am to 5pm)
- Shipley Library, 2 Wellcroft, Shipley BD18 3QH (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Keighley Library, North Street, Keighley BD21 3SX (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Bingley Library, Myrtle Walk, Bingley BD16 1AW (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Ilkley Library, Station Road, Ilkley LS29 8HA (Mon-Fri 9am to 7pm, Sat 9am to 5pm)

And on the Council's web site at www.bradford.gov.uk/planning

Also available for inspection are the Council's Sustainability Appraisal Report and Consultation Statement.

Any person may make representations about the Supplementary Planning Document. Representations must be made in writing and submitted by either email to

<u>Idf.consultation@bradford.gov.uk</u> or by letter to Local Development Framework Group, Plans and Performance Service, 8<sup>th</sup> Floor, Jacobs Well, Manchester Road, Bradford BD1 5RW. The closing date for comments is 16 December 2005. Any representations may be accompanied by a request to be notified at a specified address of the adoption of the Supplementary Planning Document.

Dated this 10<sup>th</sup> day of November 2005

Gerry A Danby, Barrister Legal and Democratic Services Director

Consultee	Comment(s) on Draft Sustainable Design Guide SPD	Bradford MDC Response	Change(s) to SPD
1. Aire Valley Conservation Society	1.1 SPD is 'most encouraging'.	<ul> <li>The Society's support for the SPD has been noted.</li> </ul>	No changes to the SPD.
	1.2 Section 3.4.5 of the Draft SPD omits hydroelectric power as a source of renewable energy.	<ul> <li>The Draft SPD does not mention hydroelectric power. While there is no scope in the district for large scale hydroelectric schemes, it would be appropriate for the SPD to acknowledge the existence of small scale and micro hydro power which could be incorporated in waterside properties / development. The Yorkshire Renewables Network promotes hydroelectric power of any scale and 'Clear Skies' provides grant funding.</li> </ul>	<ul> <li>Include information relating to small scale and micro hydroelectric power in the SPD (section 3.4.5), including grant funding and planning constraints.</li> </ul>
2. Geoffrey Barker	2.1 Enclosed Volume 130 Part 11 November 2005 edition of the Royal Horticultrual Society Journal: 'The Garden' which contains several articles concerning sustainable design.	<ul> <li>Grateful for Journal. One article, which explores the benefits of green roofs contains information which should be incorporated in the SPD.</li> </ul>	<ul> <li>Add information relating to green roofs to the SPD (section 3.4.2).</li> </ul>
3. Environment and Waste Management Improvement Committee	3.1 SPD is welcomed and supported. It will contribute to the promotion of a more sustainable district.	<ul> <li>The Committee's support for the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

Bradford MDC	3.2 Concerned that the SPD will not carry weight in determining planning applications.	<ul> <li>The SPD will be a material consideration in determining planning applications. The SPD will carry more weight as it will be an up to date, recently adopted planning document which has undergone consultation.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	3.3 Would the SPD mean that the authority could reject applications on sustainable design grounds?	<ul> <li>The SPD will not be binding, as the UDP policies which it helps to implement do not set quantifiable standards that new development must meet. However, as the document sets out the Council's understanding of what sustainable design is and how development can achieve sustainable design, the SPD can be used by all participants involved in the development control process to ascertain the relative sustainability of an application.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	3.4 The SPD should focus on how sites can contribute to achieving sustainable design, rather than just buildings.	<ul> <li>The SPD is not intended to provide guidance on the design of open spaces, landscaping and the space about buildings per se, but advises on how these elements can contribute to improving the overall sustainability of a site, as outlined in section 2.2 of the draft SPD.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	3.5 The Council should set the example and incorporate the sustainable design in its new buildings and sites.	<ul> <li>Noted. The SPD will be relevant to development proposals by the Council as well as from other organisations or individuals.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

	3.6 The SPD does not mention hydroelectric power.	<ul> <li>The Draft SPD does not mention hydroelectric power. While there is no scope in the district for large scale hydroelectric schemes, it would be appropriate for the SPD to acknowledge the existence of small scale and micro hydro power which could be incorporated in waterside properties / development. The Yorkshire Renewables Network promotes hydroelectric power of any scale and 'Clear Skies' provides grant funding.</li> </ul>	<ul> <li>Include information relating to small scale and micro hydroelectric power in the SPD (section 3.4.5), including grant funding and planning constraints.</li> </ul>
4. Drainage Section Development Services Bradford MDC	4.1 SPD should take the new draft PPS 25: Development and Flood Risk into account.	<ul> <li>PPS 25 is at present at the draft stage, and is therefore subject to change prior to adoption. The draft SPD is in line with the principles of Draft PPS 25 in that it promotes sustainable drainage (sections 2.2 and 3.4.6) and greywater recycling (sections 2.2 and 3.4.6).</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	4.2 Add 'Building drainage is constructed in accordance with the principles of sustainability' to the list of bullet points in section 1.3.	<ul> <li>The list of bullet points in section         <ol> <li>3 sets out the general objectives             of sustainable design. The             suggested addition referring the             sustainability of drainage is             covered by the first and second             bullet points, namely: 'the             construction of buildings minimises             the amount of resources, including             energy, needed as well as waste             and pollution' and ' the materials</li> </ol></li></ul>	<ul> <li>No changes to the SPD.</li> </ul>

4.3 Add 'How will the water entering the site be managed so as to provide adequate flood protection for the development and to prevent adverse impacts to others?' after 'Microclimate, soil, drainage and water table' in section 2.1.	<ul> <li>used for construction are environmentally friendly'.</li> <li>It would be appropriate to amend the SPD as suggested, as the draft SPD provides no detailed questions under the 'Microclimate, soil, drainage and water table' subheading in section 2.1.</li> </ul>	<ul> <li>Add 'How will the water entering the site be managed so as to provide adequate flood protection for the development and to prevent adverse impacts to others?' after 'Microclimate, soil, drainage and water table' in section 2.1.</li> </ul>
4.4 In section 2.2 amend bullet point 'The potential for the site to incorporate a Sustainable Urban Drainage System (SUDS) should be investigated. Contacting the Council's Drainage section is necessary to see if a SUDS is possible' to read: 'The potential for the site to incorporate a Sustainable Urban Drainage System (SUDS) should be investigated. Contacting the Council's Drainage section is necessary to see if a SUDS is possible. It is expected that the site drainage will be designed and constructed in accordance with PPS 25 (ODPM, 2005) and that however it is constructed it will meet the design requirements of the Interim Code of Practice for Sustainable Drainage Systems (NSWG, 2004)'.	<ul> <li>As explained in the response to point 4.1, it would be inappropriate to refer to the draft PPS 25 in the SPD. It would be appropriate to refer to the Interim Code of Practice for Sustainable Drainage Systems.</li> </ul>	<ul> <li>Add a reference to the Interim Code of Practice for Sustainable Drainage Systems to section 2.2 of the SPD.</li> </ul>

	4.5 Add the following bullet point to the end of the list in section 3.1: 'Climate change and urbanisation are placing major pressures on urban drainage systems and rivers. Because of this, the drainage systems of all developments are expected to protect the properties within the development from flooding and also to prevent the development from causing flooding and pollution elsewhere.'	<ul> <li>It would be inappropriate to add the suggested bullet point to the list in section 3.1 of the SPD, as the list of bullet points in this section is very general and describes the few elements of sustainable design which would be applicable to any new development, including conversion and refurbishment. Issues of flooding and flood prevention only concern new construction.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	4.6 Add the Construction Industry Research and Information Association to the list of organisations in section 7.0.	<ul> <li>It would be appropriate to amend the SPD as suggested.</li> </ul>	<ul> <li>Add the Construction Industry Research and Information Association to the list of organisations in section 7.0.</li> </ul>
	4.7 Add Draft PPS 25 to the list of useful references in section 8.0.	<ul> <li>As explained in the response to point 4.1, it would be inappropriate to refer to the draft PPS 25 in the SPD.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	4.8 Add 'Interim Code of Practice for Sustainable Drainage Systems' to the list of useful references in Section 8.0.	<ul> <li>It would be appropriate to amend the SPD s suggested.</li> </ul>	<ul> <li>Add 'Interim Code of Practice for Sustainable Drainage Systems' to the list of useful references in Section 8.0.</li> </ul>
5. Bradford Urban Wildlife Group	5.1 SPD is 'excellent'.	The Group's support for the SPD is noted.	<ul> <li>No changes to the SPD.</li> </ul>
6. The British Wind Energy Association	6.1 The SPD should refer to PPS 22: The Companion Guide which contains a section dedicated to renewable energy in the built environment.	<ul> <li>The Draft SPD is in line with the contents of PPS 22: The Companion Guide, and therefore there are no changes proposed to the content of the SPD document.</li> </ul>	<ul> <li>Amend section3.4.5 of the SPD to include a reference to the Technical Annex of PPS22: The Companion Guide relating to planning issues and other</li> </ul>

	The Technical Annex of the Companion Guide outlines the planning issues and other authorisations / consents required when installing different forms of renewable energy generation. Rather than have Bradford's guidance repeat national guidance,	authorisations / consents needed for the installation of different renewable energy sources. Add this document to the list of useful references in Section 8.0.
	the SPD should refer to the Companion Guide and include this document in section 8.0: Useful References.	
6.2 The Energy Saving Trust has guidance notes relating to renewable energy schemes.	<ul> <li>The SPD is intended to be a general document which directs the reader to detailed guidance or national policy. It would be more appropriate for the SPD to refer to the content of the Energy Saving Trust guidance notes rather than reproduce its content.</li> </ul>	<ul> <li>Incorporate a reference to the guidance and information provided by the Energy Saving Trust in section 3.4 of the SPD and amend the reference to the Trust in section 7.0.</li> </ul>
6.3 SPD should consider solar water heating, photovoltaics, biomass, wind, passive solar energy and energy from waste.	<ul> <li>The Draft SPD included guidance and information relating to solar water heating, photovoltaics, biomass, wind, passive solar energy and energy from waste (Combined Heat and Power) in section 3.4.5.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
6.4 SPD should provide advice for installing renewable energy resources in different locations, e.g. urban, rural and where planning permission and listed building consent is needed.	<ul> <li>As the SPD is intended to be a general guide and specific to Bradford, it would only be appropriate for the document to refer the reader to the detailed guidance provided in PPS22: The Companion Guide.</li> </ul>	<ul> <li>Add a reference to PPS22: The Companion Guide to section 3.4.5 of the SPD.</li> </ul>

Г			1
	6.5 SPD should provide information on grant funding for installing renewable energy.	<ul> <li>The Draft SPD included advice on grants available from the Energy Savings Trust for installing renewable energy resources. However, this scheme will be replaced in July 2006 by the 'Low Carbon Buildings Programme'.</li> </ul>	<ul> <li>Update the grant aid advice in Section 2.4.5 of the SPD to reflect the change in grant regime for renewable energy.</li> </ul>
	6.6 SPD should include case studies of successful renewable energy installations in the UK.	<ul> <li>The Draft SPD included the Ecology Building Society Headquarters, Silsden as a local case study of the principles of sustainable design being put into practice. The building incorporates photovoltaic panels. Other renewable energy schemes in the District include PV panels on Bradford Central Library, PV panels at Douglas Mill, Bradford; wind turbines at Stuart Grove, Swarland Grove and Elsdon Grove, Bradford; and PV panels at White Wells Ilkley. If there are any other good examples of renewable energy resources being incorporated into new development or retrofitted, they should be used in the SPD. It would only be appropriate for the SPD to use local examples of renewable energy resources rather than ones from further afield.</li> </ul>	<ul> <li>Incorporate any other good examples of the use of renewable energy resources in the district as case studies in the SPD (section 3.4.5).</li> </ul>
	6.7 SPD should provide links to sources of further information e.g. Energy Savings Trust website.	<ul> <li>Section 7.0 of the Draft SPD 'Useful Contacts' provides the contact details and web addresses</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

		of sources of further information, including the Energy Saving Trust.	
7. Campaign to Protect Rural England (Bradford District)	7.1 SPD generally 'good'.	<ul> <li>The CPRE's support for the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	7.2 Incorporate a section on Secured By Design.	<ul> <li>Bradford Council is in the process of preparing an SPD which will focus specifically on crime prevention, therefore it is unnecessary for the Sustainable Design Guide SPD to also cover this topic.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	7.3 Expand biodiversity paragraph in Section 2.0 of SPD to include provisions for butterflies, bats and birds.	<ul> <li>Section 2.0 of the SPD is intended to be general; therefore it would be inappropriate to begin to list protected species. These are already listed in the UDP and are protected through policies NE10 and NE12. These policies have precedence over the SPD and are already a consideration in planning applications.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	7.4 Enclosed newspaper articles on Essex Design Guide, and the design of barn conversions.	<ul> <li>The CPRE did not provide any specific reference as to how the content of the Essex Design Guide could be used improve the guidance provided in the SPD. The Essex Design Guide is primarily an urban design guide which considers sustainability as a factor in achieving successful design. The newspaper article on the design of barn conversions is concerned with heritage and</li> </ul>	<ul> <li>No changes to the SPD</li> </ul>

		aesthetics and does not relate directly to the content of the SPD.	
8. Countryside Agency	8.1 'Very supportive' of SPD. It meets the Agency's sustainability aims and policy objectives.	<ul> <li>The Agency's support for the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	8.2 Add reference to the Agency's Concept Statement research.	<ul> <li>Concept Statements are a type of brief site appraisal which takes into account the physical features of sites, landscape character and sustainability indicators. They are intended to provide a halfway house between development plan policies and maps, and detailed development briefs. Another use is to help the community why sites have been allocated for development and how this designation would impact the site. They are a useful planning tool but are not directly related to sustainable design.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	8.3 Add reference to the Agency's 'Towards a New Vernacular' document.	<ul> <li>'Towards a New Vernacular' is a four-page leaflet which encourages high quality, sustainably designed buildings. The general guidance provided in the leaflet is in line with the content of the draft SPD.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
NB – Consultee 9 commented on the Sustainability Appraisal only and their representation is in the table below.			

10.Highways Agency	10.1 Buildings should be as energy efficient as possible.	<ul> <li>The Draft SPD promotes and provides guidance for achieving energy efficiency in new and existing buildings in section 3.4.4.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	10.2 Noise and air quality should be considered.	<ul> <li>Section 2.0 of the Draft SPD considers noise and air pollution as part of site appraisal and sustainable development. Section 3.4.7 of the Draft SPD provides guidance on mitigating the impact of noise.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	10.3 Access to sites, particularly off main roads should be considered.	<ul> <li>The design of access roads / ways off roads is more appropriate to highways design guidance than sustainable design. Section 2.0 of the Draft SPD considers site access.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	10.4 Car parking requirements should be used to encourage a modal shift to more sustainable forms of transport.	<ul> <li>The Council's car parking standards are provided in full in Appendix C of the replacement UDP, therefore there is no need to reproduce the standards in an SPD over which the UDP has more weight.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
11. Ilkley Civic Society	11.1 'Very supportive' of SPD, particularly the re-use of buildings.	<ul> <li>The Society's support for the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	11.2 SPD needs greater emphasis on the space about buildings and landscaping.	<ul> <li>The SPD is not intended to provide guidance on the design of open spaces, landscaping and the space about buildings per se, but advises on how these elements</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

r			
		can contribute to improving the overall sustainability of a site. Specific guidance on the design of open spaces and the space about buildings is more relevant to urban design than sustainable design.	
	PD needs greater emphasis on ghway design.	<ul> <li>The SPD is not intended to provide specific guidance on highway design beyond recommending that sustainable materials are used. Highway design is more relevant to urban design or highway design guidance than sustainable design.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	PD needs greater emphasis on ecountryside.	<ul> <li>The SPD is intended to be used district wide and purposefully makes no distinction between urban and rural areas, as the principles of sustainable design should be applied to any location.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	PD needs greater emphasis on nerals and waste planning.	<ul> <li>The particular issues of Minerals and Waste Planning are too specific to be covered in a general guide such as the SPD. However, many of the principles of sustainable design and some of the content of the SPD are applicable to mineral extraction and waste disposal / processing sites.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
sho	nimisation of maintenance ould be added to objectives of stainable design (Section 1.3).	<ul> <li>The minimisation of maintenance is not a key objective of sustainable design. Although less maintenance will make a building</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

		cheaper to manage and require fewer resources, a sustainably designed building would require the same level of maintenance as any building made of natural materials built in the district.	
1	11.7 Add 'waste management' and site management to list in Section 2.2.	<ul> <li>It would be unnecessary to add 'site management' to Section 2.2 of the SPD, as this is covered in more detail in Section 3.4.1 of the SPD.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
1	<ol> <li>Add reference to Disability Discrimination Act (DDA) to Section 2.2.</li> </ol>	<ul> <li>It would be appropriate to add a reference to the DDA under the 'Movement and Transport' subheading in Section 2.2 of the SPD.</li> </ul>	<ul> <li>Add a reference to the DDA under the 'Movement and Transport' subheading in Section 2.2.</li> </ul>
1	11.9 Refer to CABE's 'Building for Life Criteria' and recent CABE housing audit in section 3.1.	<ul> <li>CABE's 'Building for Life Criteria' is a list of 20 factors which should be considered when designing houses or considering residential development. They chiefly concern urban design and sustainable development issues and are not directly related to sustainable design.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
1	11.10 Add internal doors and fireplaces to list of 'valuables' in section 3.3.	<ul> <li>It would be appropriate to add internal doors and fireplaces to list of 'valuables' in section 3.3.</li> </ul>	<ul> <li>Add internal doors and fireplaces to list of 'valuables' in section 3.3.</li> </ul>
1	11.11 Replace references to uPVC with PVCu.	<ul> <li>The terms 'uPVC' and 'PVCu' are interchangeable.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

11.12 Refer to disposal costs of PVCu in section 3.4.2.	<ul> <li>As landfill costs are likely to increase, it is worth mentioning in the SPD that the disposal of PVCu will become more expensive.</li> </ul>	<ul> <li>Add reference to the rising costs of committing building materials to landfill in Section 3.4.2 of the SPD.</li> </ul>
11.13 Section 3.4.2 contradiction between promoting stone and advising that stone is used 'sparingly'. Change to 'stone should not be used wastefully and in unnecessary situations e.g. roadstone'.	<ul> <li>It would be appropriate to promote the use of stone in conservation areas and listed buildings. The guidance should state that stone should be used where necessary and not wastefully, rather than 'sparingly'. Section 3.4.2 should be amended accordingly.</li> </ul>	<ul> <li>Amend Section 3.4.2 so that the SPD recommends that stone is used in conservation areas and listed buildings, and that stone is not used inappropriately (i.e. where a more sustainable material is appropriate).</li> </ul>
11.14 Section 3.4.2 should include earth (for roofs and walls), steel and paints and finishes.	<ul> <li>It would be appropriate to add earth, steel and paints and finishes to the list of building materials in Section 3.4.2 of the SPD in the interest of producing a thorough SPD document.</li> </ul>	<ul> <li>Add earth, steel and paints and finishes to the list of building materials in Section 3.4.2 of the SPD.</li> </ul>
11.15 Section 3.4.3 puts forward many very positive and useful ideas for developers.	<ul> <li>The Society's support for the content of section 3.4.3 of the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
11.16 Should Bradford MDC set itself the target of emulating the Ecology Building Society HQ (in section 4.0)? Should a targeted number of similar buildings to the Ecology HQ be built each year?	<ul> <li>The SPD will be a material consideration for all planning applications, whether submitted by private or public organisations or individuals. The SPD is intended to inform all participants in the development control process about sustainable design, rather than as a means for setting targets for new development. Rather than have a few developments which</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

		incorporate as many sustainable design features as possible, it would be preferable for a large number of the developments to incorporate some elements of sustainable design.	
1	11.17 Contradiction in section 4.0 – opening windows and airtight structure.	<ul> <li>The Ecology Building Society HQ is airtight when the windows are shut. Section 4.0 will be re-worded if necessary.</li> </ul>	<ul> <li>Re-word Section 4.0 of the SPD re: airtightness of the structure and opening windows.</li> </ul>
1	<ul><li>11.18 Contradiction between sustainability of rockwool – section 4.0 and page 16.</li></ul>	<ul> <li>The Draft SPD contains slight contradictions about the sustainability of rockwool as a building material.</li> </ul>	<ul> <li>Undertake more research into the sustainability of rockwool as a building material and amend the SPD as appropriate.</li> </ul>
1	11.19 Text relating to the ecology Building Society Case Study appears to be missing from column 3 on page 21.	<ul> <li>The following text is missing between columns 2 and 3 of page 21: "In April 2005, an extension with a straw bale structure was added".</li> </ul>	<ul> <li>Reinstate the missing text between columns 2 and 3 of page 21 of the SPD.</li> </ul>
1	11.20 Section 7.0 should include CABE and English Heritage. Also Wolmersley's Ltd is another sustainable local materials supplier. Are there more and should they be included?	<ul> <li>It would be logical to add CABE, English Heritage and any other sustainable / recycled building material suppliers to Section 7.0 of the SPD. However the Council must not endorse or recommend any one firm.</li> </ul>	<ul> <li>Add CABE, English Heritage and any other sustainable / recycled building material suppliers to Section 7.0 of the SPD. The private firms should be listed separately and prefaced with a statement stressing that the Council does not recommend or endorse any of the firms listed.</li> </ul>
1	11.21 Section 8.0 does not mention Tree SPG and the Council's Environment Strategy.	<ul> <li>The Tree SPD is currently being produced. It would be appropriate to add The Bradford Multi-Agency Environmental Strategy 2002-2007</li> </ul>	<ul> <li>Add the Bradford Multi-Agency Environmental Strategy 2002-2007 to the list in Section 8.0 of the SPD.</li> </ul>

	to the list in Section 8.0 of the SPD.	
11.22 Section 9.0 provides some excellent guidance.	<ul> <li>The Society's support for the content of section 3.4.3 of the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
11.23 Make reference to DPC being unsuitable for historic buildings in Section 9.0	<ul> <li>DPC is appropriate in historic buildings if it is installed in an appropriate manner, therefore it is unnecessary to alter Section 9.0.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
11.24 Is 'recycled PVC' reference in Section 9.0 meant to say 'recycled PVC fencing'?	<ul> <li>In Section 9.0 'Recycled PVC' should read 'Recycled PVC fencing'.</li> </ul>	<ul> <li>In Section 9.0 amend the reference to 'Recycled PVC' to 'Recycled PVC fencing'.</li> </ul>
11.25 Contradiction between use of expanded polystyrene for ground floor and pitched roof insulation in section 9.0, as it says this material is 'poor in sustainability terms' on page 16.	<ul> <li>There is a contradiction between page 16 and Section 8.0 of the Draft SPD regarding the sustainability of expanded polystyrene as insulation.</li> </ul>	<ul> <li>Research the sustainability of expanded polystyrene as insulation and amend Sections 3.4.4 and 8.0 of the SPD as appropriate.</li> </ul>
11.26 Balconies in Section 9.0 – is it right to recommend steel or aluminium?	<ul> <li>Although not the most environmentally friendly materials, aluminium and steel are still the most sustainable alternatives to sustainably sourced timber for balconies in Section 9.0.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
11.27 No reference to downpipes in Section 9.0. These may need to be cast iron or lead at historic buildings.	<ul> <li>Downpipes are covered in Section 9.0 of the Draft SPD, but are referred to as drainpipes. The term 'downpipes should be added.</li> </ul>	<ul> <li>Add the term 'downpipes' after 'drainpipes' in section 9.0 of the SPD.</li> </ul>

	11.28 What does dry, semi-dry and wet glazing installation mean?	<ul> <li>In Section 9.0 'dry' glazing installation refers to the use of extruded rubber gaskets to seal the edge of the glazing. 'Wet' installation uses a sealant over a preformed tape or gasket to seal the windows. This terminology is technical and would benefit from further explanation.</li> </ul>	<ul> <li>Explain terms 'dry', 'semi-dry' and 'wet' glazing installation in Section 9.0 of the SPD.</li> </ul>
	11.29 SPD should refer to designing out crime.	<ul> <li>Bradford Council is in the process of preparing an SPD which will focus specifically on crime prevention, therefore it is unnecessary for the Sustainable Design Guide SPD to also cover this topic.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	11.30 No reference in SPD to mothballing a building for future use – ensuring a site is secure and the fabric does not decay.	<ul> <li>The Draft SPD promotes the re- use of existing buildings and demolition and the reclamation of materials and fittings as a last resort. The mothballing of buildings and sites is an alternative to demolition and would safeguard the potential to re-use buildings or recycle its materials. Mothballing is more sustainable than allowing an empty building to physically deteriorate and be prone to vandalism or arson. It would be logical to add mothballing to Section 3.0 of the SPD.</li> </ul>	<ul> <li>Add a section relating to the mothballing of buildings for future re-use to Section 3.0 of the SPD.</li> </ul>
12. Ilkley Design Statement Group	<ul> <li>12.1 Supportive of SPD, particularly the re-use of existing buildings.</li> <li>12.2</li> </ul>	<ul> <li>The Group's support for the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

13. Lancashire County Council	13.1 SPD 'contains valuable guidance'.	The County Council's support for the SPD is noted.	No changes to the SPD.
14. The Theatres Trust	14.1 Supportive of the retention of historic buildings and the use of demolition as a last resort.	<ul> <li>The Trust's support for the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
15. Keith Thomson	15.1 SPD is welcomed. It is presented in an attractive and clear fashion. The appendices offer useful detail and links. Supports principle of lifetime costing.	<ul> <li>Pleased that the SPD is supported.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	15.2 Wind turbines on the moors should not be discouraged as per Policy NR13 of the UDP, as man has altered the character of the moors over centuries.	<ul> <li>Policy NR13 of the Replacement UDP was adopted in October 2005 and has undergone consultation as part of the preparation of the Replacement UDP. This policy will remain in place until the Replacement UDP is superseded.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	15.3 The SPD should not encourage waterless urinals. They smell and the cartridges are expensive and require regular changing and disposal. Greywater reuse is more sustainable.	<ul> <li>More guidance about the suitability / practicality of using waterless urinals is needed.</li> </ul>	<ul> <li>Find out whether the use of waterless urinals should be encouraged or whether greywater recycling is more appropriate. Amend the SPD as appropriate.</li> </ul>
	<ul> <li>15.4 SPD is unclear as to whether rockwool is a sustainable material – different advice on pages 16, 21 and 29.</li> </ul>	<ul> <li>The Draft SPD contains slight contradictions about the sustainability of rockwool as a building material.</li> </ul>	<ul> <li>Undertake more research into the sustainability of rockwool as a building material and amend the SPD as appropriate.</li> </ul>
	15.5 The SPD does not mention the importance of fencing in reducing crime and increasing	<ul> <li>Crime prevention through design is not directly related to the principles of sustainable design and</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>

	safety, as well as the wider principles of Secured By Design. 15.6 The SPD does not mention microgenerators to provide domestic heat and electricity.	<ul> <li>construction and is therefore not relevant to the SPD.</li> <li>The Draft SPD does not mention microgenerators. Microgenerators are new technology, therefore it would be inappropriate for the SPD to recommend the use of microgenerators until they are proven to make a positive contribution to achieving sustainable design. The SPD should at least acknowledge that the technology exists but its development is at an early stage.</li> </ul>	<ul> <li>Amend section 3.4.5 of the SPD to include a reference to microgenerators which stresses that this new technology has not been tested in the long term and therefore it is difficult to ascertain its overall contribution to sustainability.</li> </ul>
	15.7 It may be difficult for sustainable design to be embraced by private development, but there is no excuse not to use the principles of the SPD in all publicly funded development.	<ul> <li>The SPD will be used as a material consideration in determining planning applications by the Council, other public bodies, and private developers and individuals</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
16. Yorkshire Forward	16.1 Supportive of SPD.	<ul> <li>Yorkshire Forward's support for the SPD is noted.</li> </ul>	<ul> <li>No changes to the SPD.</li> </ul>
	16.2 Make reference to UK Sustainable Development Strategy.	<ul> <li>The suggested amendments covered by points 16.2-16.9 would improve the content of the SPD.</li> </ul>	<ul> <li>Incorporate Yorkshire Forward's suggested amendments (points 16.2-16.9) in the SPD.</li> </ul>
	16.3 Make reference to BREEAM and Ecohomes standards.		
	16.4 SPD should encourage energy efficiency prior to the consideration of renewable energy		

sources.	
16.5 SPD should promote sustainably managed UK timber over imported FSC timber.	
16.6 Add reference to Waste Action and Recycling Programme (WRAP).	
16.7 Make reference to 'Low Carbon Buildings Programme' which will replace BRE's 'Clear Skies' programme and DTI's Major PV Demonstration Programme in July 2006.	
16.8 SPD could set out the requirements for the installation of Ground Source Heat Pumps.	
16.9 Add contact details of WRAP, DTI, Straw Bale Construction and BREEAM / Ecohomes.	

# APPENDIX 3: SUMMARY OF REPRESENTATIONS TO SUSTAINABILITY APPRAISAL REPORT FOR THE SUSTAINABLE DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT

Consultee (Name/Org anisation)	Representation(s) to Sustainability Appraisal Report	Bradford MDC Response	Outcome
1. David Wilson Homes	1.1 It is not clear whether the Sustainability Appraisal is an appraisal of the Draft Sustainable Design Guide SPD or has a wider purpose.	<ul> <li>The Sustainability Appraisal assesses the contribution that the Sustainable Design Guide SPD would make to achieving sustainable development. The document sought to make clear in the introduction the role of the document and its relationship with the sustainability appraisal of the RUDP.</li> </ul>	No changes to the SA.
	<ol> <li>The Sustainability Appraisal is very general and lacks vigour and provides statements that are unclear.</li> </ol>	<ul> <li>The Sustainability Appraisal has been prepared in line with central government guidance and is in line with the scale of the Draft SPD.</li> </ul>	No changes to the SA
	1.3 The Council should follow PPG3, paragraph 42(a) and the Employment Land Reviews: Guidance note (December 2004) before concluding the best use of land, as mentioned in paragraph 4.11 of the sustainability appraisal.	<ul> <li>Noted. However, this is a consideration for the allocation of land through a development plan document of the emerging LDF and not the SPD. Paragraph 4.11 sets out a conclusion as to the general impact if the guidance in the SPD is followed which supports the reuse of brownfield land for development in support of the policies &amp; allocations in the adopted RUDP.</li> </ul>	No changes to the SA
	1.4 The measures outlined in Appendix 1 of the Sustainability Appraisal are by and large acceptable, but they are not equal in weight and there is no indication regarding the way in which they will be used in accessing (sic) a proposal or	<ul> <li>The objectives and indicators in Appendix 1 were used to appraise the replacement UDP. They are based on national guidance at the time. Weighting of sustainable objectives is not part of recognised SA methodology and is discouraged in national guidance.</li> </ul>	No changes to the SA.
	policy. In the absence of weighting and/or a methodology for assessment the list has little, if any, meaning.	<ul> <li>The tables in Appendix 2 are taken from the Council's (June 2001) 'Replacement Unitary Development Plan for the Bradford District: Background Document No.2: Sustainability Appraisal (First Deposit)'; and the July 2002 'Replacement Unitary Development Plan for the Bradford</li> </ul>	
	1.5 The analysis behind the conclusions set out in the tables in Appendix 2 of the Sustainability Appraisal is unclear and there is a lack of clarity of the linkages that produce the beneficial or adverse impact. Without that analysis it is a meaningless list which is open to challenge.	District: Background Document No.2a: Sustainability Appraisal (Revised Deposit)'. These documents provide the background to the assessment of the sustainability of the policies of the replacement UDP. The documents have been prepared in line with national guidance and have been scrutinised by a planning inspector. National guidance on SA allows a lower level appraisal such as an SPD to draw on the higher level SA, such as the RUDP.	No changes to the SA.

## APPENDIX 4: LIST OF OTHER CONSULTEES

Bradford Ward Councillors	G Farrar Quarries Ltd
Bradford MP's and MEP's	Friends of the Earth (Leeds)
	George Wimpey Northern Yorkshire Ltd
Addingham Civic Society	Denis Gilson & Son Ltd
Airedale Partnership	Harden Village Society
Aire Valley Conservation Society	Health and Safety Executive
Arc Northern	Heaton Township Association
Baildon Civic Society	Home Builders' Federation
Bardon Roadstone Ltd	Housing Corporation, (NE Region)
Barton Willmore Planning	Ilkley Civic Society
Bingley Civic Trust	Ilkley Design Statement Group
Bradford & District Chamber of Trade	Littman Robeson
Bradford & Northern Housing Association	M & M Stone
Bradford Access Action	Manningham & Girlington SRB
Bradford Botany Group	Menston Community Association
Bradford Business Link	Morton Village Society
Bradford Chamber of Commerce and	North Country Homes Group Ltd
Industry	Oakworth Village Society
Bradford Civic Society	Patchett Estates Ltd
Bradford Community Housing Trust	Percy Pickard Merchants Ltd
Bradford Retail Action Group	Plot of Gold Ltd
Bradford Urban Wildlife Group	Regen 2000
Bradford Vision	RSPB (North West Region)
British Wind Energy Association	Tarmac Roadstone Ltd
Campaign For Real Ale	The Theatres Trust
CB Richard Ellis Ltd	Transport 2000
Commission for Architecture and the Built	UK Waste Ltd
Environment	Walton & Co
Countryside Properties (Northern) Ltd	Wastepoint Ltd
CPRE Bradford District	West Yorkshire Ecology
Dialogue Communicating Planning	Wilsden Village Society
DPDS Consulting Group	Yorkshire Stone Quarries Ltd
Eldwick Village Society	Yorkshire Wildlife Trust

Produced by the City of Bradford Metropolitan District Council

> Local Development Framework Group

> > October 2008

City of Bradford MDC