

## **Q and A Responses - Session 7: Environmental Policies – 4<sup>th</sup> March 2021**

Session Questions / Matters Raised	Response
<p>How will the Local Plan enable Bradford to get to Net Zero Carbon?</p>	<p>The Local Plan has a key role to play in helping Bradford achieve net zero carbon emissions – particularly in terms of new development. Policy SP9 requires new development to be located in accordance with the settlement hierarchy and close to services and facilities thereby reducing the need for people to travel and therefore minimising emissions from transportation. The policy also requires new buildings to be energy efficient through their design, layout and use of materials (including insulation) – thereby reducing the energy use of the building. In addition, it supports opportunities for the delivery of renewable and low carbon energy. The policy also requires the provision of Green Infrastructure including tree planting and habitat management which can help with the absorption of carbon.</p> <p>It is acknowledged that the proposals in the Local Plan alone will not fully achieve net zero emissions – a number of other initiatives will be required – including the work being undertaken by the West Yorkshire Combined Authority on emissions pathways – looking at measures which will need to be taken to reduce emissions and looking at options for carbon sequestration such as tree planting. Achieving net zero will also require significant behavioural change in terms of how people travel and use energy.</p>

<p>If and when the Government's new planning proposals come into force, will they override Local Plans ?</p>	<p>The government is currently analysing the response to the consultation on the Planning White Paper and any Bill will take time to work through the parliamentary stages before the new system comes into force.</p> <p>At this stage it is unclear as to exactly the form 'new style' local plans will take and what local level policies will be included. There is likely to be a transitional period in terms of moving from the previous planning system to the new system. However, the Ministry of Housing, Communities and Local Government have made it clear that Local Authorities should continue to prepare their Local Plans against the existing legislation in order to meet the government's deadline of putting in place an up-to-date Local Plan by December 2023.</p>
<p>I asked in Transport "How will planning permissions and conditions be used to achieve the policy aims of much reduced traffic? For example how will they avoid developments like the two-car households in New Bolton Woods, and the increased car capacity in the Bradford-Shipley scheme under implementation? I was told that this would be covered under climate change, and that existing schemes are not subject to the plan. Why is it not covered in the environment section? How can catastrophic climate change be averted and the net zero carbon aim be achieved when current plans drive a coach and horses through these aims if this plan doesn't attempt to remedy them?</p>	<p>The Local Plan (with supporting suite of policies) will provide the key local planning document against which decisions for planning applications will be determined. This will include the planning policies detailed in the plan on such issues as climate change, urban design, healthy places and sustainable transport. Where relevant, policies in relation to individual sites may stipulate additional key development considerations. A number of the policies proposed in the plan start with a focus upon designing more active, healthy and sustainable developments / communities with less car dependence. Planning conditions can play a positive role in enhancing the quality of a development or enabling a development to proceed where it would otherwise have been necessary to refuse planning permission. The planning conditions imposed on a</p>

	<p>planning permission ideally need to be tailored to the development and kept to a minimum and satisfy the tests set out under para 55 of the NPPF. It is worth noting that plans can, and do, change.</p>
<p>Are there enforceable standards in the plan for housebuilders to build zero carbon housing stock. e.g. to Passivhaus standard.</p>	<p>Policy SP9 looks specifically at climate change mitigation, adaptation and resource use – and indicates that development proposals should use resources sustainably – by utilising natural light, ventilation and solar gain through their design and layout (such as Passive design) thereby reducing the need for energy for lighting, heating and cooling. They should achieve high standards of energy efficiency through the use of appropriate materials and insulation.</p> <p>Policy HO9 looks more specifically at Housing Standards. It encourages and supports new residential developments to achieve high sustainable design and construction standards and achieve high energy efficiency standards by 2025 in line with the Government's Future Homes Standard, which exceed the minimum standards where possible. The minimum acceptable sustainable housing standards are set out in the Building Regulations.</p>
<p>I think you said that the local plan cannot really address emissions from existing buildings - is that correct?</p>	<p>Certainly has a role in term of new development and will have a role in terms extensions / alterations to existing buildings - but much will depend upon type and location (for example listed buildings).</p> <p>The local plan is part of a wider portfolio of Council documents, which can play a role in tackling</p>

	<p>emissions. These include the Sustainable Development Action Plan which makes reference to Housing Strategy delivery plan and resource identification, including involvement in the Scaling Up Better Homes Yorkshire project – Bradford involvement and city region, large scale retrofit scoping (LCR Energy Plan). District work is to be developed after the Pathways Study (LCR Energy Plan/emerging LCR Climate Emergency Plan).</p>
<p>Its brilliant having such a local plan with all these proposed controls but given the proposed changes to the planning process which appears to favour developers giving them a loaded deck, how much influence and control will local authorities really have over development?</p>	<p>The government is currently analysing the response to the consultation on the Planning White Paper and any Bill will take time to work through the parliamentary stages before the new system comes into force.</p> <p>At this stage it is unclear as to exactly the form 'new style' local plans will take and what local level policies will be included.</p> <p>There is likely to be a transitional period in terms of moving from the previous planning system to the new system.</p> <p>However, the Ministry of Housing, Communities and Local Government have made it clear that Local Authorities should continue to prepare their Local Plans against the existing legislation in order to meet the government's deadline of putting in place an up-to-date Local Plan by December 2023.</p>
<p>How is the plan to support reduction of carbon emissions and air pollution consistent with plan to widen canal Road which will increase levels of traffic and therefore carbon emissions and air pollution.</p>	<p>The plan has to balance a number of competing issues – and there will inevitably be some tensions between the need for growth and ensuring we reduce carbon emissions and air pollution. Policy SP9 requires mitigation and adaptation measures to be incorporated into new development proposals including the provision of Green Infrastructure.</p>

	<p>The Canal Road/Valley Road improvement scheme looks to deliver a range of benefits including improved journey times and reduced traffic congestion – which in turn should help to reduce air pollution. A range of green space and wildlife habitat improvements as well as flood alleviation measures and the re-naturalisation of Bradford Beck along the route are also proposed which are designed to improve the environment in this location and can also help with carbon absorption.</p>
<p>You use weasel words and phrases like "no exceptional circumstances" and "adaptation measures" and "biodiversity" and "protection of open spaces", but is it not the case that any building on designated Green belt land would be a crime?</p>	<p>The case for the release of Green Belt land through the local plan is based upon exceptional circumstances, which will be subject to public examination as the plan progresses.</p>
<p>Could I ask a question re the Green Infrastructure Standards? Does this mean a guarantee to a certain amount of green space for residents e.g. access to (a certain amount of space) within (a certain distance?) And does it apply just to new developments or all residents?</p>	<p>The plan is looking at whether there is a need to include a specific policy which introduces Green Infrastructure (GI) Standards. The aim of this policy would be to require new development to provide a level of Green Infrastructure in line with those standards. This may include the provision of greenspace within the development site or provision of another site elsewhere, or improvements to a nearby site. Initial thinking from Natural England suggests that the new national GI standards would be based on their established Accessible Natural Greenspace Standards (ANGSt). These recommend that everyone should have access to natural greenspace and set out a range of site sizes and distances in which people should expect to travel to access these spaces.</p> <p>The policy can only apply to new developments – but other projects and initiatives may also use the</p>

	standards to increase provision of greenspace or other Green Infrastructure assets (e.g. street trees, green roofs etc) where there are deficits in provision.
In Ilkley IL1/H is in an environmentally sensitive area with 130 dwellings to be built. I do not like the idea of offsetting environmental protection measures. The destruction of greenbelt cannot be offset by an area of green space in the middle of a housing development.	Policy EN2 (Biodiversity and Geodiversity) sets out to ensure that all development (except small scale householder applications) should deliver a measurable net gain in biodiversity value compared with the pre-development baseline. Although related in part, developments will also be required to meet the open space standards as set out in the plan (Policy CO1). Further evidence work will be commissioned on the ecology and habitats as part of the plan-making process and prior to the next formal consultation stage on the plan.
If you are so confident that the designation of a not insignificant amount of housing along the Canal Road corridor should meet the green infra credentials, sustainable transport planning requirements, etc, why do you feel it necessary to widen Canal Road?	The plan has to balance a number of competing issues – and there will inevitably be some tensions between the need for growth and ensuring we reduce carbon emissions and air pollution. Policy SP9 requires mitigation and adaptation measures to be incorporated into new development proposals including the provision of Green Infrastructure. The Canal Road/Valley Road improvement scheme looks to deliver a range of benefits including improved journey times and reduced traffic congestion – which in turn should help to reduce air pollution. A range of green space and wildlife habitat improvements as well as flood alleviation measures and the re-naturalisation of Bradford Beck along the route are also proposed which are designed to

	<p>improve the environment in this location and can also help with carbon absorption.</p> <p>The emerging transport strategy will look to explore these issues in more detail. It is felt that the Canal Road corridor is relatively easy to serve by sustainable transport (there is already a greenway). It is also worth noting that the widening of Canal Road will facilitate the provision of a sustainable transport corridor along Manningham Lane. Canal Road forms a strategic function providing access from Wharfedale and Airedale to the motorway network and as such is always likely to be highly trafficked.</p>
Re what you have just said, the "transition" should include abandoning highways projects. We haven't the time to mess with the climate emergency.	<p>The local plan includes a range of transport projects including road improvements and potential new road infrastructure. There are often economic, local environmental and safety cases for highways projects. There is likely to be a transition over the plan period to transport projects which further support and prioritise active travel and public transport. It could be argued that we are currently in transition and when it comes to organisational change, transition doesn't happen overnight. Until a scheme is built, it can still be abandoned.</p>
Could we please consider whole life carbon emissions on which electric vehicles are far less attractive than they are made out to be. Further, currently electric vehicles have higher per km small and micro-particulate emissions which are the key emission to tackle for health benefits. The only current measure to tackle that is to reduce vehicle-kms.	<p>Comments noted in relation to whole life carbon emissions and continued role of electric vehicles in particulate pollution. The transport policies include a clear focus upon mode shift including progressively encouraging more people to travel by more sustainable modes including walking, cycling and public transport (Policy SP7).</p>

In Ilkley it is planned to build 285 houses on greenbelt area - this cannot be right, one site allocated is not near to a main road and will involve car travel to the town centre.	The Council considers that the proposed housing sites are sustainably located with detailed information contained within the relevant site pro formas.
What future for cargo e-bikes in Bradford?	Policy TR6 – Freight - makes reference to encouraging the delivery of goods by sustainable modes including cargo bike.
Will the ongoing work on the Viability Assessment take into account the climate, environmental and health costs of supporting the negative legacy policies e.g. prioritising road building over active travel e.g. Wharfedale Greenway over Ilkley Park and Rail?	The viability assessment is concerned with assessing the impact of policies and infrastructure requirements (all relevant types) on the economic viability of development and site proposals. The work undertaken to date is available on the Council's website under evidence material. Government guidance on viability and plan-making is available here: <a href="http://www.gov.uk">Viability - GOV.UK (www.gov.uk)</a> .