

Q and A Responses - Session 18: Environmental Policies – 11th March 2021

Session Questions / Matters Raised	Response
<p>Just for info - B14/H and B 18/H in Eldwick -both fields now have huge puddles from the rain earlier. If there were houses there this water would have flown down into the Prince of Wales Park and down into Heights Lane - the latter would flow toward Park road which often floods and is under constant repair already...or you would need expensive drainage for just 39 dwellings...</p>	<p>Thanks for the information - I would include in your representations - we have access to surface water flood risk maps but direct on site information is very useful. SUDs doesn't always needs to be expensive and can be integrated within wider landscaping / GI.</p>
<p>What is a SUD?</p>	<p>Sustainable urban drainage system</p>
<p>Are you planning any more allotments?</p>	<p>The open space evidence base (Open Space Audit and Open Space Needs and Demand Assessment) helps to identify those areas where there are deficiencies in provision of allotment space (compared to the size of the population of the settlement) or where there is demand for allotment space (identified through waiting lists for existing allotment sites). Although the plan has not, at this stage, identified specific sites for new allotments, there may be opportunity on some of the larger housing sites to look at the possibility of provision of new allotment space as part of any masterplanning exercise on those sites. The area strategy work for each settlement should identify the different typologies of open space which are a priority for increased provision.</p>
<p>It seems ironic developing green spaces whilst getting rid of green belt space.</p>	<p>Not all Green Belt is greenfield – for example the major employment allocation at Apperley Bridge and not all Green Belt land fulfils a strong green belt function and not all Green Belt is accessible.</p>

<p>How do you reconcile the South East Bradford Access Road proposal through the Tong Valley with the Councils desire to reduce air pollution, and why does the plan not address the very serious issue of noise pollution ?</p>	<p>Policy EN9: Environmental Protection looks specifically at different sources of pollution including noise. Point B of the policy states that <i>“Proposals for development must identify potential nuisance issues (including noise, vibration, odour, light and dust) arising from the nature of the proposal and address impacts on that development from existing land uses.”</i></p> <p>The Council is currently working on a Feasibility Study for the SEBAR that will look to establish the deliverability of the scheme, what its costs and benefits might be and how it contributes to the Council’s wider agenda and policy objectives.</p>
<p>No mention of bats so far... we have lots in Eldwick</p>	<p>As part of the site assessment work consideration has been given to the areas where bats are most prevalent. The ‘Bat Alert’ constraints layer has helped to flag any issues with regards to the presence of bats and further ecological survey work will be carried out on sites where there are potential impacts.</p>
<p>Is Baildon in Zone B?</p>	<p>The majority of Baildon is within SPA (Special Protection Area)/SAC (Special Area for Conservation) Zone C.</p> <p>A small part of the settlement to the north at Heaton Drive falls within Zone B.</p> <p>The extent of the zones can be viewed on the map at Appendix 3 of the plan.</p> <p>More information about the Zones is provided in Policy SP11.</p>

<p>How do these zones feed into consideration of planning in green belt land? Specifically, if an area is green belt and in zone B</p>	<p>The consideration of the SPA/SAC zones is a separate issue to the consideration of green belt land. Where a site falls within SPA/SAC zone B consideration will be given as to whether the land proposed for development affects foraging habitat for qualifying species of the SPA (based on the criteria set out in the draft Supplementary Planning Document and such evidence that may reasonably be required – e.g. bird surveys).</p> <p>Land within the Green Belt that is proposed for allocation is assessed against the five purposes of including land within the Green Belt as set out in the National Planning Policy Framework. The exceptional circumstances for allocating land within the Green Belt are set out in Policy SP5 of the draft Local Plan. The full Green Belt site assessment documents are available on the evidence page of the website.</p> <p>When selecting a site for allocations a large number of criteria are assessed and issues including impact on the Green Belt and on the SPA/SAC are all factored into the decision making process.</p>
<p>Why has the council proposed substantial housing development in environmentally sensitive areas before assessing the feasibility, nature and extent of anti-flooding measures. What liaison has there already been with the water authorities? anti flooding</p>	<p>The site assessment process considers flood risk at the outset in terms of considering constraints. The Site Assessment and Rejected Site Background Paper provides details of how the sites considered were ordered in terms of their likely risk of flooding.</p> <p>The Level 1 Strategic Flood Risk Assessment (SFRA) sets out details of the different flood risk levels across the District and this has been used to steer the site selection to those sites located in areas of low flood risk in the first instance. The SFRA has been prepared in line with government guidance and in partnership with the Environment Agency. A</p>

	<p>further update to the SFRA is being prepared to take account of new river modelling and allowances for climate change.</p> <p>More detailed work in the Level 2 SFRA will provide specific flood risk assessment to those sites which are located in areas of higher flood risk – informing the sequential approach to site acceptability and layout, in terms of avoiding and reducing flood risk, and the design of possible mitigation measures.</p> <p>If sites in higher areas of flood risk are deemed acceptable – full mitigation and flood protections measures will need to be included in any development scheme for the site.</p>
<p>Please could I ask a question about how the teams link up with the local plan team? This may have been mentioned, but I don't understand how the conflicting pressures (ecological v housing need etc) are addressed and balanced in the production of the draft plan.</p>	<p>The Local Plan team is made up of a number of planning officers all with a broad range of knowledge of the factors which must be considered as part of plan-making. Within the team there are officers who have specialisms in housing, economy, environment etc. However, within the wider Planning, Highways and Transportation service there are more specialist teams who deal with Countryside and Rights of Way issues (including the council's ecologist), Landscape, Design and Conservation issues, Drainage and Flood Risk issues, and Highways and Transport. We have consulted internally with officers in these teams to ascertain their views relating to the full set of sites that have been considered in the plan. Their responses feed into a matrix where officers aim to balance competing factors and select those sites which are likely to have the least impact on the environment and greatest impact in terms of the provision of new housing/employment in the most sustainable locations. In some instances, there may</p>

	<p>be sites chosen which will have a negative impact on one or more factors. In these cases, mitigation measures will be recommended and further work will need to be carried out before confirming the allocation in the next version of the plan.</p> <p>In addition, colleagues in other parts of the council, including Environmental Health, Public Health, Housing, and Asset Management are also consulted on the plan and their input is also factored into the site selection process where appropriate.</p> <p>The Sustainability Appraisal (SA) of the plan is also used to help highlight where a particular site scores negatively against any of the SA objectives. The SA is a mechanism for assessing the extent to which an emerging plan promotes sustainable development by applying a holistic assessment of the likely effects of the plan on social, economic, and environmental objectives.</p>
<p>No mention so far on hedges and ancient hedgerow preservation. Hedges provide both environmental benefits and can be a security feature in place of fences which Bradford seems to prefer on new sites. In some areas this is encouraged.</p>	<p>Hedgerows are protected under the Hedgerows Regulations 1997.</p> <p>Policy EN3: Trees and Woodlands also makes reference at point C to the presumption in favour of the retention and enhancement of trees, woodland and hedgerow cover.</p> <p>Consideration will be given to including reference to hedgerows in Policy SP9: Green Infrastructure – relating to both their protection and also their provision within new developments.</p>
<p>In the process of developing this policy have you discussed the proposed incinerator at Keighley and the potential environmental impact?</p>	<p>The proposed incinerator site is included as a commitment within Policy EN19 (Waste Management Allocations) and has planning approval which will have considered potential environmental</p>

	<p>impacts. The policies set out in the plan work on the basis that environmental impacts have been effectively considered through the application process and in determining the application with any relevant conditions attached.</p>
<p>Is the plan for a "fruit tree in every garden" being enforced within each development site where dwellings have gardens?</p>	<p>Policy EN3, Point D states that <i>'New trees and woodland should be planted on all new development in both public and private areas, including a fruit tree in every garden'</i>. The Council's Homes and Neighbourhoods – A guide to designing in Bradford Supplementary Planning Document also includes the requirement for a fruit tree in every garden. Development proposals should include this requirement in the landscaping designs for their schemes.</p> <p>In terms of enforcing this requirement – where it is stipulated in a planning condition or identified as part of the approved plans then the Council can take action to ensure the plans are complied with. However, once the dwellings are occupied, it may be more difficult to ensure the trees are retained.</p>
<p>Do you mean that those 70 measures have already been done before a site is added to the draft plan?</p>	<p>We have reviewed sites against a wider range of measures / indicators etc but the summary only is presented in the pro-formas.</p> <p>Sites are assessed against the criteria set out in the Site Assessment Methodology. When selecting sites to take forward allocations, consideration is given to the findings from the site assessment work and those sites with the least number of constraints/ those likely to have the lowest impact are chosen. However, given the limited number of sites and the magnitude of the housing requirement – there will be instances where difficult choices have to be made</p>

	and some sites have been included as allocations where there is a potential negative impact. These sites will need to include mitigation to reduce the level of the impact. Further work will be required to understand in more detail whether these sites can be brought forward.
What about owls?	As part of the ecology surveys that will be carried out on a number of the proposed sites – consideration will be given to the types of habitat which are present on-site and will also highlight where sites are important for protected species.
We have a wildlife rich brownfield - important to consider sites on their merits. What are your views?	Absolutely - particularly on sites that have been vacant / unused for some time and near GI / established networks. Will need to be evaluated for ecological value on a site by site basis.
What are the pro formas? Do you mean the local plan available to public access?	These are the proposed site allocation 'pro formas' at the end of each section within section 5. They set out the summary details for each site proposed for allocation – including key constraints and opportunities, and development considerations for each site.
You stated that officers have done an audit of all green spaces, recreation spaces is it viewable and is it possible to split down into area specific e.g each village, town to help raise awareness of this important topic	Yes - on the Council's evidence page - headlines are also within each settlement portrait in Section 5 of the Local Plan. There Open Space Audit is available here . Section 5 of this document provides a detailed overview of the types of open space within each settlement.
What about the other traffic bottle necks - Baildon down to Shipley, Saltaire, Keighley etc	The Council will be undertaking further detailed assessments of the potential impact of the site proposals on the highway network using a strategic transport model. The outcomes from this work will form part of the local plan evidence material to support the next stage of the local plan.

<p>Flood risk this is obviously highly dependant on liason with the environment agency, but worried about maintenance of culverts and where undersize culverts are causing a problem.</p>	<p>The Local Plan is informed by its evidence base – including the Strategic Flood Risk Assessment (SFRA). The Level 1 SFRA is currently being updated to take account of new Environment Agency river models. This should provide some details regarding culverted watercourses. The Level 2 SFRA will provide more detailed flood risk assessment for those sites located in higher flood risk areas and will highlight where culverted watercourses are an issue.</p> <p>The Council’s drainage team works with a new of partner organisations to ensure culverts are maintained. They have also been involved in the preparation of the SFRA and are consulted on the proposals in the Local Plan and also on planning applications for new development.</p>
<p>Air quality - distance new developments are approved close to existing major roads.</p>	<p>The Air Quality policy currently sets out a range of measures to minimise increased exposure to existing poor air quality – such as the use of design solutions, and buffers zones including green infrastructure. The exact technical standards of buffer zones is not currently included in the policy, but may be subject to further policy definition, or as part of work on the Clean Air Plan and CAZ SPD.</p>
<p>Can you explain more on the district heat network?</p>	<p>The district heat network is a new energy network delivering low carbon and low cost heat to city centre buildings. The District Heat Network is an urban central heating system that enables power and heat to be moved between buildings via underground pipes. The plans will see civic, public sector and commercial buildings in Bradford city centre share benefits including: lower price energy, lower carbon emissions, reduced heating costs. Part of the plans involve a low carbon energy centre</p>

	being built near the city centre to provide the low carbon heating.
I guess my major concern is how all these excellent policies can be met when challenged by a huge planned development on a particular site e.g. >150 houses. Some of those on the plan seem to potentially break traffic, infrastructure, ecological, air quality and I can't see how they can be adequately mitigated against. Particularly when they take out a chunk of a corridor in the green infrastructure network. I do recognise the conflicting pressures, but it's trying to work out why certain sensitive sites have been included.	The policies require certain measures to be put in place to mitigate the likely impact of new development on the environment. A large part of this comes down to the design and layout of the development. In the case of Green Infrastructure networks – the policy acknowledges that some development may occur within GI corridors – but the expectation from the policy is that the routeways should be retained in some form and that the networks should not be severed. Biodiversity net gain should be achieved on site by retaining important features in the first instance but new habitat of greater concentrations which have a greater biodiversity value (against the DEFRA Metric) will need to be provided on-site or compensated for off-site.
Looking forward to 2038 any research by the council on accommodating hydrogen production and fuelling facilities?	The West Yorkshire Combined Authority are leading on several initiatives in relation to carbon emission reduction pathways including the H21 North of England scheme which is looking at a detailed engineering solution for converting 3.7 million UK homes and businesses from natural gas to hydrogen, in order to reduce carbon emissions. More information can be found on the Northern Gas Networks website. More information on how WYCA are tackling the climate emergency is available here .
Have you included floating pv on reservoirs?	The plan has not provided specific details of the type of renewable energy schemes which could come forward in the future. At a corporate level a number of renewable energy schemes are being considered

	<p>with additional funding being provided in the 2020/21 council budget towards such initiatives. The Council is also currently out with a call for sites for renewable energy projects.</p>
<p>re this slide B14/H the topography goes left to right as well as down...</p>	<p>The arrows on the plan provide an indication of the prominent topography of the site – with the slight angle to the arrows providing the direction of the slope. The feedback regarding the direction of the slope will be passed to the relevant officer.</p>
<p>Please could I ask a question to help me understand the process better about how and when these assessments against specific policies are done?</p>	<p>The site assessment work included onsite review of constraints with desktop follow-ups. The approach and methodology to undertaking the site assessment work is set out under the evidence base on the Council's website. This work included an extensive level of peer review work on site detail in particular. The proposed policies and sites within the plan have also been subject to both a Sustainability Appraisal and Habitat Regulations Assessment – both documents are also available on the Council's website.</p>