

Report of the Assistant Director (Planning, Transportation & Highways) to the meeting of Executive to be held on 19th November 2013.

AJ

Subject:
Local Plan Core Strategy Publication Draft for Submission to government for Examination

Summary statement:

The Council is in the process of preparing the Local Plan (formerly the Local Development Framework) which will replace the current Replacement Unitary Development Plan for Bradford District. The first of the Local Plan documents is the Core Strategy which sets out the strategic approach to managing development and change to 2030. Following consultation on the Further Engagement Draft in 2011 and 2012 a revised draft has been prepared for submission to government for independent examination.

This report outlines the Core Strategy publication draft as well as the key considerations which have shaped the document including consultation, technical evidence and national policy.

The Executive is recommended to approve the Core Strategy for submission to government.

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Overview & Scrutiny Area:

Regeneration & Economy



1. SUMMARY

- 1.1 The Council is in the process of preparing the Local Plan (formerly the Local Development Framework) which will replace the current Replacement Unitary Development Plan for Bradford District. The first of the Local Plan documents is the Core Strategy which sets out the strategic approach to managing development and change to 2030. Following consultation on the Further Engagement Draft in 2011 and 2012 a revised draft has been prepared for submission to government for independent examination.**
- 1.2 This report outlines the Core Strategy publication draft as well as the key considerations which have shaped the document including consultation, technical evidence and national policy.**
- 1.3 The Executive is recommended to approve the Core Strategy for submission to government.**

2. BACKGROUND

- 2.1** In accordance with the Planning & Compulsory Purchase Act 2004, the Council has commenced the preparation of the Local Plan, formerly known as the Local Development Framework (LDF) for the Bradford District in line with the agreed Local Development Scheme adopted by the Council. The local plan will ultimately supersede the current Replacement Unitary Development Plan (as saved by the Secretary of State Oct 08). The Council is committed to produce the following suite of Development Plan Documents:
- Core Strategy
 - Allocations Development Plan Documents (DPD)
 - Bradford City Centre Area Action Plan (AAP)
 - Shipley and Canal Road Corridor Area Action Plan (AAP)
 - Waste Management Development Plan Documents (DPD)
- 2.2** The Core Strategy will provide the spatial vision and objectives for the District to 2030 and will include strategic policies to inform future development proposals, Development Plan Documents and investment decisions. The other Development Plan documents will provide a more detailed approach in support of the Core Strategy and its spatial vision, including detailed site allocations.
- 2.3** Area Action Plans for Bradford City Centre and Shipley and Canal Road Corridor are in preparation in order to:-
- Deliver planned growth areas;
 - Stimulate regeneration;
 - Focus the delivery of area based regeneration initiatives



- Reduce the need for green field and green belt development in other parts of the district.
- 2.4 The Allocations DPD will allocate land to meet housing needs as well as jobs in line with the scale and distribution set out in the Core Strategy. It will also set out the detailed approach to key green infrastructure, such as recreation open space and playing pitches, amongst other things.
- 2.5 The Waste Management DPD sets out the planning framework for managing the District's waste in a sustainable manner. It includes policies and allocations for the management of waste in line with the national waste strategy and relevant European regulations. It deals with all types of waste including municipal.
- 2.6 Progress to date on all of these plans is set out in the Annual Monitoring Report (AMR) for 2012. While the two Area Action plans have commenced preparation with testing of Issues and Options, the Allocations work will only start once the Core Strategy is submitted and will take up to 3 years to reach adoption.
- 2.7 The Planning & Compulsory Purchase Act 2004 as amended by the Localism Act provides the Legal basis for the preparation of the statutory development plan. This is supplemented by detailed regulations in particular Town and Country Planning (Local Planning) (England) Regulations 2012. The Development plan process is made up of 5 main stages.
- Stage 1 Initial Evidence gathering
 Stage 2 Initial Consultation and continued work on evidence gathering (reg18)
 Stage 3 Publication and Submission (Reg 17, 19 and 22)
 Stage 4 Examination (reg 23-24)
 Stage 5 Adoption (Reg 26)
- 2.8 The Core Strategy has reached stage 3. Work under stage 1 and 2 is summarised below with reference to previous engagement and technical work.
- 2.9 The Core Strategy is the key strategic document which sets out the proposed approach to managing development and change to 2030. It provides the strategy to inform more detailed choices when allocating sites and making other designations in the more detailed DPDs to follow.
- 2.10 The Core Strategy Publication Draft contained in Appendix 1, has been based upon the National Planning Policy Framework (NPPF) and where relevant the now revoked regional guidance, extensive community engagement and consultation, and technical evidence and research. Each of these elements is considered in turn below.

National Policy

- 2.11 The Core Strategy has been prepared in line with national policy. The current planning policy (apart from that dealing with waste and with Traveller Sites) is set out in National Planning Policy Framework (NPPF), issued in March 2012. This



consolidated a range of Planning Policy Statements and Planning Policy Guidance notes. The NPPF reaffirmed the plan led system and enshrined it into the presumption in favour of sustainable development. It places importance on having an up to date and robust local plan in place to guide development decisions. It introduced the term Local Plan (in place of LDF) and set out consolidated guidance on what a Local Plan should cover.

2.12 The NPPF includes a new presumption in favour of sustainable development. For Local Plans this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
 - Specific policies in the NPPF indicate development should be restricted.

2.13 The NPPF suggests that the strategic policies of Local Plans should seek 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, conservation and enhancement of the natural and historic environment, including landscape.
- Protection of open space and recreation facilities and support for identifying opportunities for enhanced provision
- A move from a position of net loss of biodiversity to achieving net gains for nature

2.14 The NPPF makes clear that the Local Plan should cover and apply to a period of 15 Years from the expected date of its adoption. Local Plans should be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.

2.15 Local Plans are required to be based upon adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The NPPF sets out key evidence required to ensure compliance and soundness of a Local Plan.

2.16 Detailed guidance on specific topics is also provided. Further guidance has been published on an online resource in draft.



Regional Policy

- 2.17 The Localism Act removed the regional element of planning (Regional Spatial Strategies) from the statutory development plan. The Yorkshire and Humber Plan which informed the development of the Core Strategy was formally revoked in February 2013. In its place a new 'Duty to cooperate' was introduced to deal with strategic issues which affect more than one adjoining LPA. The duty also applies to a range of other key bodies. In advance of the formal revocation, the LCR partnership leaders board agreed an interim statement which sought to ensure ongoing alignment of the emerging Local Plans in the sub region.

Neighbourhood Planning

- 2.18 The Localism Act Also introduced new tools which could be used by local communities to inform development locally. These include the opportunity to prepare Neighbourhood Plans which, following a referendum could become part of the statutory development plan. Neighbourhood plans can only be used to positively support development and are required to be in line with the policies within the Local Plan. At present there are four Parish Councils who are at the early stages of preparing a neighbourhood plan for their areas.

Consultation and Engagement

- 2.19 In line with the statutory Regulations, several stages of consultation and engagement have been undertaken in the preparation of the Core Strategy in accordance with the Council's Statement of Community Involvement (SCI). Key formal consultation stages took place in 2007, 2008 and 2011/12. Full details of all previous consultation documents together with summaries of the consultation responses and events are available on the Council's web site.
- 2.20 The last stage of consultation was the Core Strategy Further Engagement Draft (FED) which set out the preferred option and the discounted options. It included draft policies for comment. It was published for comment between 28th October 2011 and the 29th February 2012.
- 2.21 The Statement of Consultation contained in Appendix 2 describes the consultation and engagement undertaken to date together with a summary of the key issues raised in the comments and representations. The Council also received four petitions. The first with 1008 signatories related to development at Holme Wood. The second was from the Eldwick & Gilstead Horticultural Society with 56 signatories which expressed concern about impact of development on green space. The third was from the Thornton Wind Farm Action Group with 225 signatories raising concern over the policies in relation to wind farm development. The fourth with 60 signatories related to concerns in Idle and Thackley about development and loss of green space. These have all been considered as part of the preparation of the Publication Draft.
- 2.22 The key broad issues raised by the representations, include:
- Scale and distribution of development
 - Need to support regeneration and use of previously developed land
 - Need to safeguard green belt and green space



- Impact on settlements and communities of scales of development
- Need to protect and manage key assets including natural and built environment
- Need for adequate infrastructure (transport, education and utilities) to support development

2.23 The statement of consultation provides further details of the main issues and the council's response. Many of the issues raised are linked to further technical work undertaken since the consultation.

2.24 A large number of the 1200 representations received contained comments which related not to the Core Strategy itself but to the detailed sites set out in the Strategic Housing Land Availability Assessment (SHLAA). This was despite extensive briefing and information which stressed that the SHLAA was merely a technical background document.

Technical Evidence

2.25 In line with Government requirements set out in national guidance and good practice, a range of technical evidence was produced and informed the chosen approach in the last consultation version. These included:

- Strategic Housing Land Availability Assessment (SHLAA)
- Strategic Housing market Assessment (SHMA)
- Affordable Housing Economic Viability Assessment (AHEVA)
- Employment Land Study Update
- Retail and Leisure Study

2.26 Several of these studies have been subsequently updated as required by national guidance and additional work undertaken to meet new requirements in NPPF. The main studies are considered in turn below in terms of headline issues and how they have informed the publication draft approach.

Housing Requirement Study

2.27 All Core Strategies are required to set housing requirement targets which reflect the expected growth in the district's household population and its economy over the period of the plan. This is a role which was previously part of the Regional Plan. Following revocation of RSS, and in line with the NPPF, the Council commissioned consultants GVA to carry out a study to establish the districts objectively assessed need for housing. GVA have proven experience in this field and have undertaken similar studies for a number of other Local Authorities including Leeds and Calderdale. This study also fulfils the Council's resolution of 10 of July 2012, which sought external verification of the demographic basis for housing targets within the plan.

2.28 GVA, in partnership with Edge Analytics, used the POPGROUP Model to produce a number of scenarios, the 2 core scenarios of which were then used to produce a range from which the housing requirement target should be set. The NPPF, makes clear that the start point for objectively assessing housing need are the sub-national



population and household projections issued by the Government. To this end, the key data inputs to the modelling and scenarios were the Government's 2008 based household projections and 2010 based population projections (the most up to date available at the time) and the economic and jobs growth forecasts from the Yorkshire and Humber Regional Econometric Model (REM). Their February 2013 report therefore recommended the plan set a target towards the top of the following range – 2,210 to 2,565.

- 2.29 Following the government issuing of the Interim 2011 based household projections, an addendum report was issued by GVA which used the data within the new projections to re-run the original two core scenarios. The new 2011 based household projections, because they were based on the trend period which contained the depths of the credit crunch and recession, not surprisingly indicated a lower rate of household growth than the previous 2008 based projections which were conversely based on a trend period of strong economic growth. GVA's updated report suggests that basing the housing target on the new 2011 based projection alone would not be desirable or realistic because it would effectively imply that the severely depressed conditions prevalent during the recession will continue throughout the plan period to 2030. It would produce a housing target which would not meet the full needs of the district and would therefore potentially frustrate both economic growth and the Council's efforts to reduce overcrowding and improve housing choice.
- 2.30 GVA therefore recommend setting the target at the mid point between original REM based scenario which utilised 2008 based household projection data and the new REM scenario which utilised the 2011 data. The range of 1,807 (2011 based projections) to 2,565 (2008 based projections) produces a housing target (net) of just under 2,200 per annum. This is the target used within the Core Strategy. Using a target based on the REM also reflects the need to align economic projections, assumptions and aspirations of the plan with housing policies which will support and help deliver them.
- 2.31 The Plan therefore adopts 2,200 per annum for the period 2011 to 2030 as the basis for objectively assessed future needs. However the Government also requires that the total housing quantum includes any backlog of unmet need from the previous plan period and this has therefore also been added to the total housing requirement within the plan. In line with the Council's strategic priorities the total has however been reduced on the assumption that 3000 of the required homes will be met via the reduction in long term vacant homes which is the target set within the Council's Empty Homes Strategy. The resulting proposed total plan requirement, once allowance has been made for housing completions already achieved, is therefore 42,100 dwellings to 2030. This is a reduction of around 3,500 when compared to the housing requirement of 45,500 set out in the Core Strategy Further Engagement Draft.

Strategic Housing Land Availability Assessment (SHLAA) update

- 2.32 The SHLAA has been updated since the last consultation. This has included additional sites from the following sources:



- New sites with planning permission
 - Additional submissions from land owners – mainly green belt
 - New brown field sites from survey and public
 - Reduction of site size threshold from 0.4ha to 0.2ha
- 2.33 The SHLAA provides a high level assessment of the possible land supply to meet the housing need in the Core Strategy.
- 2.34 The first SHLAA only identified land for approximately 44, 000 dwellings. However, the update included more sites from the sources listed above. The update identifies a total possible supply of land for approximately 54,000 dwellings. However, of this total only 19,500 dwellings are considered suitable now. The rest are subject to some form of constraints and many fall within areas subject to a range of current planning policies. These policies include both those which would mainly affect the form and layout of development such as conservation areas and TPO's and those which would currently prevent development such as green belt. Of the total SHLAA land supply capacity of 54,000 only 18,000 was brownfield and approximately 19,000 was on land currently in Green Belt.
- 2.35 While the SHLAA now shows a supply above the plan housing requirement it does illustrate that the full housing needs cannot be met without the use of Greenfield land and without change to the green belt. The SHLAA has informed the housing distribution and associated housing delivery policies of the core strategy.

Growth study

- 2.36 The Growth Study, produced by consultants Broadway Malayan, provides a strategic level assessment of which parts of the district would be capable of and most suitable for accommodating growth in the form of urban extensions or local green belt deletions. The key outputs from the study relevant to the consideration of the housing distribution are:
- A general assessment of the environmental, social and economic characteristics of each settlement;
 - A broad and strategic review of the role and importance of the green belt around each settlement;
 - An examination of the area around each settlement and using a sieving process the identification of areas of search which are subject to relatively low levels of constraints;
 - Subjecting the areas of search and a selection of SHLAA sites to a scoring appraisal.
- 2.37 This study together with the SHLAA has informed the housing distribution policies and sub area policies on development and change.



Habitats Regulation Assessment and South Pennine Moors Birds and Habitats Surveys

Under 'the Habitats Regulations', the Council is required to undertake an Assessment of the policies and proposals in the plan, to ensure that these would not lead to adverse effects on the ecological integrity of internationally important habitats or species within or close to the district; particularly in relation to the South Pennine Moors. An initial draft report concluded that the development proposed in the Core Strategy as configured at the Further Engagement Draft stage, could have adverse effects on the protected habitats and associated birds due to the extent of development located close to the moors and through increases in population. Effects were likely via the following impact pathways:

2.38

- Loss of supporting habitats
- Increased emissions to air from road traffic
- Wind turbines (collision risk, displacement)
- Recreational impacts (disturbance, trampling/erosion, fire, dog fouling)
- Urban edge effects (cat predation, fly tipping/ invasive species, scavengers)

2.39 A full Habitats Regulation Assessment (HRA) was undertaken by Urban Edge consultants. As part of the HRA further survey work was undertaken to inform the publication draft and the HRA. Additional surveys over the summer sought to provide further information on the following:

- Supporting habitats in the 2.5km zone around the protected designation area;
- Bird sightings within the 2.5km zone;
- Visitors to moorland areas

2.40 Based upon the further evidence and the full HRA a range of changes have been made to the policies of the Core Strategy. These include:

- A new core policy on Zone of influence
- Amendments to the biodiversity and energy policies
- Reduced housing requirements in key sensitive locations based on bird clusters and key supporting habitats in particular in Ilkley, Menston, Burley in Wharfedale, Addingham and Silsden;
- The distribution of housing development has been adjusted to reduce the magnitude of impacts on the South Pennine Moors SAC/SPA. This has significantly reduced the housing targets assigned to Wharfedale sub area from a total figure of 3,100 to 1,600 in the proposed Publication Draft. This will allow a strategy to be developed for successfully avoiding and mitigating remaining adverse impacts.
- The strategy will also include measures to:
 - Seek provision of Alternative recreational spaces to reduce visitor pressure
 - Enhance and restore habitats
 - Manage access



Strategic Housing Market Assessment (SHMA) update

- 2.41 The SHMA has been updated by ARC4 consultants. This draws upon the Housing Requirement Study and also provides an update in terms of affordable housing needs.
- 2.42 The update has led to a reduction in the affordable housing need as a percentage of the total housing requirement. It has also led to a reduced percentage requirement on private development sites in different market areas. This is based upon both need and viability considerations.

Strategic Flood Risk Assessment

- 2.43 The Strategic Flood Risk Assessment, prepared by JBA Consulting on behalf of the Council has been reviewed with the Environment Agency. This has informed the content and policies in the plan, particularly the section relating to flood risk and water management.

Retail and Leisure Study update

- 2.44 The Retail & Leisure Study has been updated by retail planning consultants WYG on behalf of the Council and has informed the policies and the network and hierarchy of centres in the Core Strategy. The key objectives of the Retail & Leisure Study (in full conformity with NPPF and Planning for Town Centres Practice Guidance) is to:-

1. Update the retail expenditure forecasts of the baseline condition (2007), but also take into account the growth planned for in the emerging Local Plan - Core Strategy by assessing alternative scenarios and identifying locations for new centres in areas of significant growth and/or in areas of clear deficiency;
2. Assessment of the quantitative and qualitative need and capacity for additional retail floorspace in Bradford District to enable the Council to reach judgement on the scale and form of development planned for through Local Plan.
3. Update assessment of the vitality and viability of the five key town centres of Bradford City Centre, Ilkley Town Centre, Bingley Town Centre, Keighley Town Centre and Shipley Town Centre and undertake vitality and viability assessments of the District Centres, Local Centres and Neighbourhood Centres;
4. Provision of detailed policy advice and recommendations for the Local Plan including:-
 - a) Definition of town centre boundaries (including primary shopping areas and primary and secondary shopping frontages)
 - b) Identifying an appropriate range of sites capable of accommodating any future retail need and consider their impact on existing centres; and



- c) Advise with regard to the minimum floorspace threshold for retail development in an edge of centre or out of centre location that should be subject to a supporting impact assessment

Local Infrastructure Plan

- 2.45 The Local Infrastructure Plan has been updated by consultants DTZ and ARUP. This has confirmed the scale and criticality of a range of infrastructure requirements through the Local Infrastructure Schedule. It has sought as far as possible to identify how this infrastructure can be delivered and funded. However, given the length of the plan period and associated inherent uncertainties regarding long term infrastructure it is important that the infrastructure plan is treated as a 'live' document which will be regularly updated. The Plan suggests that there are no show stopper infrastructure issues which cannot be mitigated or planned for. The Local Infrastructure plan will inform, where necessary, the phasing of development within the plan period.

Employment Land Assessment update

- 2.46 This has been updated with the latest economic projections and market information. It has been used to revise the employment policies in particular the scale and distribution of new employment land required.

Local Plan Core Strategy Viability Assessment

- 2.47 A new requirement in NPPF is that all plans should demonstrate that they are deliverable particularly in terms of ensuring development is not made unviable by the requirements of the Core Strategy. To this end consultants DTZ have been commissioned by the Council to review the viability of the plan. DTZ have completed the assessment of the last consultation version of the Core Strategy which has informed the Core Strategy Publication Draft and will inform future evidence base work on housing and employment land. Government guidance makes clear that, based on the information gathered, the Council's Core Strategy cannot contain policies, requirements or standards which would result in development becoming unviable.

Sustainability Appraisal

- 2.48 A requirement of national guidance is to undertake a Sustainability Appraisal (SA) of a Local Plan. This also incorporates the requirements under European legislation for Strategic Environmental Appraisal. Consultants AMEC have been commissioned to undertake the SA of the plan. The SA process is embedded through out the process and earlier versions of the Core Strategy have been subject to separate SA work which have then informed subsequent documents. The SA sets out the range of positive and also negative impacts across the policies. It also assesses the chosen option against the alternatives. The publication draft has been amended with reference to the SA findings. Appendix 3 contains a non technical summary of the SA of the publication draft contained in Appendix 1.

Equalities Impact Assessment

- 2.49 In line with equality duties under the Equality Act 2010 the Core Strategy has been the subject of an Equalities Impact Assessment (EIA). The assessment has take



into account the impact that the proposal being assessed might have on the protected characteristics groups. The EIA is set out in Appendix 4.

Health Impact Assessment

- 2.50 While not a legal requirement, the Council recognises the role the planning and development can have on the health of communities. A Health Impact Assessment (HIA) has therefore been produced by health professionals within the Council which sets out the potential impacts of the policies. The preparation of the HIA has informed the publication draft.

Local Plan Tests of Soundness

- 2.51 The publication draft is the final stage prior to submission to government for independent examination. As such this is the stage when it becomes the plan that the Council wishes to see adopted. At this stage the Council needs to ensure that it will pass the key tests at independent examination.

- 2.52 The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To this end, a local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 2.53 In approving the publication draft the Council must be content that the plan is ‘sound’ in terms of the above key tests. A failure to submit a sound plan could result in either delay in the plan being found sound due to the need for further work including evidence, changes and related consultation and a delayed examination. It may also result in the need to withdraw a plan altogether to allow for further work and resubmission.

Publication Draft Core Strategy For Bradford District

- 2.54 As noted above, significant work has been undertaken to ensure robust technical evidence in support of the chosen development strategy and policies. A significant number of changes have been made from the last consultation version. These reflect in the main the updated evidence base (as noted above) and NPPF but also where appropriate seek to address issues raised by representations.



2.55 The document is made up of 7 chapters with sub sections as follows:

- 1) Introduction
- 2) Plan context
- 3) Vision/Objectives/ Core Policies
- 4) Sub area policies
 - City of Bradford including Shipley and Lower Baildon
 - Airedale
 - Wharfedale
 - South Pennine Towns and Villages
- 5) Thematic Policies
 - Prosperity - Economy and Jobs, Transportation and Movement
 - Housing - Planning for People
 - Planning for Places – Environment/Minerals/Waste/Design
- 6) Implementation and Delivery
- 7) Monitoring and performance

2.56 Each of these sections is highlighted below together with significant changes from the last consultation version.

2.57 Section 1 sets out the introduction including purpose of Core Strategy and links to other parts of the Local Plan.

2.58 Section 2 sets out the context for the document including work undertaken to date. It sets out the key strategy linkages and the spatial portrait of the key issues and challenges which have shaped the core approach and which the Core strategy needs to address.

2.59 Section 3 sets out the spatial vision to 2030 and supporting plan objectives, together with the Strategic Core Policies.

2.60 The spatial vision is founded upon the Council's Community Strategy and the key issues, challenges and opportunities facing the District as highlighted in the recent Understanding Bradford District Report. The plan objectives which follow on from the Spatial Vision establish the key means of how it is to be achieved. The Strategic Core policies then set out the key policy elements in support of the vision and objectives. The subsequent sections then provide more detail on how these will be achieved. The Strategic Core Policies cover the following broad areas:

- Overall approach and key spatial priorities
- Climate change and resource use
- Working together
- Hierarchy of settlements
- Location of development
- Green infrastructure
- Green belt
- Zones of influence for the South Pennine Moors SPA
- Making great places through good design



- 2.61 Several of the Objectives have been amended to provide clarification and reinforce the delivery of the vision.
- 2.62 Several of the core policies have been refined and updated in particularly linked to the updated evidence on land supply and distribution. In particular the HRA has resulted in the hierarchy of settlements to be amended. As a result of the reduction in growth and development envisaged, the settlements of Menston and Burley in Wharfedale have been downgraded to Local Service Centres from growth centres.
- 2.63 Two new core policies are now included. The first (Policy SC8) is needed to ensure potential impacts on the South Pennine Moors SPA are adequately addressed in planning decisions. This policy is included in response to the HRA work and has been derived using both the HRA findings, good practice and also the views of Natural England and RSPB. The Second (Policy SC9) seeks to provide the strategic elements for creating quality places through good design of development and change.
- 2.64 At the heart of the NPPF is the presumption in favour of sustainable development. In order to embed this into the Core Strategy a new high level policy P1 is now included which is based upon the Planning Inspectorate model suggested policy.
- 2.65 Section 4 sets out sub-area policies. These relate to the following broad areas:
- City of Bradford, including Shipley and Lower Baildon
 - Airedale
 - Wharfedale
 - South Pennine Towns and Villages
- 2.66 These policies set out the scale and broad distribution for development and change (homes and jobs) within each sub area including settlements, together with how key environmental assets, both built and natural, will be managed. It also seeks to identify key areas of infrastructure, in particular transport, which will require improvement in support of the development strategy and other investment priorities. They include a supporting sub area spatial vision for each place by 2030.
- 2.67 Section 5 contains the thematic policies. These are organized into three themes, namely Planning for Prosperity, Planning for People and Planning for Place.
- 2.68 The focus under Planning for Prosperity is to support sustainable economic growth and job creation. This has been drafted to compliment the District Economic Strategy and reflect the issues and evidence within the Local Economic Assessment. It covers supporting measures to create jobs, protect existing economic assets, and provide new supply of the right land in the right places in order to support the commercial property markets. This has been informed by the Employment Land Study and its subsequent update. The section also sets out the approach to supporting successful and viable city, town and district centres, informed by the updated Retail and Leisure study.



- 2.69 The policies have had minor amendments including new employment land supply figures and distribution and also the retail policies as a result of updated Retail and Leisure study.
- 2.70 The first theme also includes Transport and Movement. It contains proposed policies on travel reduction and modal shift, public transport, cycling and walking, parking policy and freight. There have been minor changes to these policies to provide clarification. The Accessibility Criteria have been revised in partnership with West Yorkshire METRO.
- 2.71 The second theme under Planning for People focuses on housing. The Housing Requirement Study shows that the District is facing a rapidly growing population with increases across all age groups. This in turn is placing increasing pressure on the existing housing stock. One of the biggest challenges for the Core Strategy is therefore to plan to meet the housing needs of this growing population in a sustainable way which assists regeneration while minimising the impact on the environment.
- 2.72 The Housing section therefore includes a range of policies which set out the overall target or requirement for housing over the plan period, how that housing should be distributed across the different parts of the district, and policies to ensure that the right amount of affordable housing is secured, the quality and type of housing is appropriate to the needs of the community and new provision for gypsies, travelers and travelling show people.
- 2.73 The approach to the housing requirement is based upon the Housing Requirement Study recommendation of 2, 200 dwellings per annum for the period 2011- 2030. The period up to 2011 is based upon the previous RSS target .This equates to a total requirement of 56,140 dwellings between 2004 and 2030.
- 2.74 Housing completions already achieved between 2004 and 2013 total 11,053 leaving a backlog of unmet housing need against the requirement of 7,687 dwellings which also needs to be delivered within the plan period. An allowance for absorption within existing stock (reduction in long term vacancy of 3,000 dwellings) has also been made. The remaining requirement for which land needs to be allocated in the Local Plan for new housing therefore amounts to approximately 42,100 dwellings.
- 2.75 The detailed approach to meeting housing need has been informed by a range of evidence with different options being tested for example to gauge whether there would be differences in the impacts on the transport network. The Strategic Housing Land Availability Assessment (SHLAA) has also informed the locational strategy and detailed distribution since it provides information on the scale and nature of potential housing land in different parts of the district.
- 2.76 The supply of housing land is partly addressed by existing commitments (RUDP Allocations + Planning Consents) which could in theory generate 18,734 dwellings (AMR 2010). Even if all of these permissions and sites were deliverable and fully implemented this would still meet only 44% of the housing requirement outlined above. The total land supply found to be deliverable and developable in the SHLAA,



which includes not only these existing commitments but all other known potential new sites also indicates the challenge. Although it amounts to around 54,000 dwellings a large proportion of this lies in locations either within the green belt or covered by other environmental designations.

- 2.77** The Publication Draft therefore indicates that in order to meet the district's housing needs a large amount of new land, including both brownfield and green field will need to be allocated. The Plan identifies an urban extension at Holme Wood in line with the approved Neighbourhood Plan. It also identifies the need for additional smaller local green belt deletions across the district.. It will be the job of the subsequent Local Plan documents, not the Core Strategy, to indicate the specific range of sites to be released, but the Core Strategy has picked out the Holme Wood urban extension since it is expected to lever in additional regeneration benefits including investment and community infrastructure to the area. The Bradford SE area, of which Holme Wood forms a part, was also an area which the Growth Assessment referred to above recommended as a particular focus for growth. The Plan also indicates that a range of smaller local green belt releases in locations across the district but in particular adjoining the main urban areas of Bradford and Keighley will be needed to meet the total housing required.
- 2.78 Although the need to release green field and green belt land is set out, the Core Strategy also sets out a range of policies and proposals which will minimise the amount of such land required and also mitigate the effects of this development. Firstly the plan includes proposals for two growth areas within the urban area, namely the Shipley & Canal Road Urban Eco Settlement and also Bradford City Centre. Achieving ambitious plans for around 6,700 new dwellings in these two predominantly brown field locations will provide substantial environmental and regeneration benefits, support the City centre economy and reduce what would otherwise be a much larger take of green field and green belt land.
- 2.79 Other measures to reduce green field land take include a continuation of the Council's current policy of trying to secure reasonably high development densities, particularly in areas accessible to services and public transport. This will ensure that land is used efficiently and not wasted. The plan also proposes that sites, when identified in the Local Plan, are released in two phases. This will allow the most sustainable sites to be phased for release first and will allow the later phasing of sites where big items of new infrastructure are needed which will take time to be put in place. .
- 2.80 Policy HO3 sets out the distribution of housing growth and follows the settlement hierarchy with the focus of development being in the City of Bradford, followed by the Principal Towns of Bingley, Ilkley, and Keighley and then the Local Growth Centres of Queensbury, Silsden, Steeton with Eastburn and Thornton. Individual housing targets are indicated on a settlement by settlement basis. Setting targets at settlement level within the Core Strategy will help speed up the process of preparing the Allocations DPD and will provide a framework for any local communities who want to produce their own Local Neighbourhood Plans.



- 2.81 Access to housing is an issue for many communities and the proposed approach includes a target for affordable housing of around 25%, with different targets applying to different market areas. This is based upon the findings of the updated Strategic Housing Market Assessment (SHMA) and is tested in terms of economic viability through the Affordable Housing Economic Viability Assessment (AHEVA) and the Local Plan Viability Assessment. The Core Strategy also includes positive policies to drive up housing quality with reference to the Lifetime Homes and Code for Sustainable Homes standards, to address the problems of overcrowding in existing communities, and to reduce the number of empty homes.
- 2.82 The final theme, Planning for Place, includes a wide range of policies linked to quality of life issues for residents and ensuring that the district remains attractive for visitors. To achieve this policies aim to; protect open space and recreation facilities and achieve improvements to meet the needs of a growing population, protect, manage and enhance biodiversity assets, moving from a position of net loss to net gains for nature, conserve and enhance the districts historic environment, requiring development to respect assets and safeguard and enhance the character of local landscapes, in circumstances where Greenfield land is needed for development Policies encourage the provision of renewable and low carbon energy, while requiring assessment of potential adverse impacts, seek to reduce flood risk and adopt a positive approach to water management and require that known environmental risks and the sensitivity of proposals to adverse effects from pollution be taken into account.
- 2.83 It includes a set of policies relating to minerals which seeks to ensure protection of key minerals. Two policies seek to set the strategic policies for the management of waste which link to the Waste management DPD which seeks to deliver the appropriate level of waste management facilities during the plan period.
- 2.84 The final set of policies within this section are all new and seek to ensure good design is at the heart of development and growth.
- 2.85 Section 6 sets out policies to support the delivery of the above policies. It includes policies on the role of the other DPDS and AMR, Developer contributions (Sec 106 and Community Infrastructure Levy.), Working with partners and communities, methods and tools to support development (Local Development Orders etc) and possible approaches to funding and delivery. In light of Plan Viability Assessment it includes a new policy on development viability
- 2.86 The final section sets out the proposed monitoring framework for the plan and its policies and the links to both the AMR and corporate/District performance systems which has been revised to provide a more focused approach.

Submissions to Government for Examination

- 2.87 The Executive are recommended to approve the Core Strategy Publications Draft for submission to government for independent examination. Submission is a decision for Full Council and as such, subject to the decision of Executive, the Publication Draft will need to be considered and approved by Full Council on 10 December.



- 2.88 Once approved the publication draft would then be issued for formal public representations for a period of 6 weeks in line with the Government Regulations. At this stage representations area invited on the 'soundness' or otherwise of the plan to be considered by the Examining Inspector appointed by Government. This stage is not a consultation stage. To this end the engagement in support of the publication will be limited to assist those making representations and understanding the chosen approach and supporting evidence.
- 2.89 The Council will then collate any representations made at publication stage. If the consideration of the representations highlight an issue which would make the plan unsound the regulations allow for further changes prior to submission, though these should be the exception.
- 2.90 Following submission to government an independent Inspector will be appointed to undertake the examination into the soundness of the plan. The examination will take the form of roundtable hearings into key matters determined by the Inspector taking into account the representations and the evidence base. Those who made representations would have a right to appear at the examination. The Inspector would normally review the plan and representations to be satisfied that the plan can proceed to examination.
- 2.91 Following examination the Inspector would provide a report setting out whether the plan is sound with reference to the key tests outlined above. The inspector can recommend non substantisive changes to the plan as part of the report. If significant soundness issues are found they may result in the plan being found unsound and further work required and the plan being resubmitted for examination.
- 2.92 If the plan is found sound the inspectors report and recommendations would be brought back to the Council for consideration and a decision on formal adoption. Once adopted the Core Strategy would be part of the statutory plan for the district and replace certain of the currently saved policies of the RUDP.
- 2.93 Further work on more detailed development plan documents would then seek to ensure the supply of detailed sites to meet future development needs in line with the policies of the Core Strategy.

3. OTHER CONSIDERATIONS

- 3.1 The NPPF presumption of in favour of sustainable development makes clear that decisions should be made against the local plan. For planning decision it states that this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are Out-of-date, granting permission unless:*



- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted*

- 3.2 The RUDP was adopted in 2005 and the policies saved in 2008. The Plan period was only until 2014 and had a significantly lower land supply in particular for homes that is now required to be delivered. While many of the policies still comply with NPPF the housing land supply in particular is not up to date.
- 3.3 NPPF makes clear that the Local Planning Authority should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- 3.4 The latest SHLAA update demonstrates that the Council does not currently have a five year supply in line with NPPF. It currently stands at 2.3 years. In this case the NPPF allows for sites which would otherwise be protected to be considered in order to ensure a deliverable supply of housing land. This has already resulted in the approval of some sites currently protected in the RUDP such as safeguarded land, but could mean pressure on more sensitive sites which ordinarily the District would not necessarily want to see developed. Given the scale of the housing requirement the only way the district can ensure a 5 year supply is to allocated more land though the new Local Plan.
- 3.5 Given the above it is imperative that the Council proceeds to put in place an up to date Local Plan as soon as practicable. Until a new up to date plan is in place decision making particularly on housing developments will be determined with reference to the presumption in NPPF and away from local control. As noted above, this will mean that land currently protected could be allowed for development to meet the short term shortage of housing land. The sooner the District has an up to date local plan will mean that decisions can be made on the basis of local choices for sites to meet the districts housing needs, rather than the uncertainty which comes without an up to date plan in light of the NPPF presumption in favour of sustainable development.
- 3.6 It is also important to communities, business and investors that an up to date plan is put in place in order to ensure certainty and confidence. It also will assist in supporting the attraction of much needed investment into infrastructure projects based on clearly articulated plans for delivering growth and supporting business case for supporting investment.



4. FINANCIAL & RESOURCE APPRAISAL

- 4.1 The preparation of the Local Plan is undertaken by the Development plan group, which is funded from within the Department's resources, supported by a one off corporate growth payments to cover abnormal costs of consultation and engagement, Technical studies and examination cost.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 5.1 There are risks to the Council as a result of not having an up to date Local Plan. These include uncertainty for decision making and potential costs from successful appeals.

6. LEGAL APPRAISAL

- 6.1 The Core Strategy has been prepared in line with the appropriate, legislation (UK and EU), regulations and guidance. The report details how the legal obligations under the Planning and Compulsory Purchase Act 2004 and Regulations are being met.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

The consultation on the Core Strategy is undertaken in line with the Statement of Community Involvement, which sets out how the Council will seek to engage the community in the preparation of development plan documents. In order to achieve this it seeks to set a framework to ensure representative and inclusive involvement and engagement at all stages of document preparation. Particular consideration is given in the document to hard to reach groups. In addition the Core strategy has been subject to an Equality Impact Assessment.

7.2 SUSTAINABILITY IMPLICATIONS

All Local Plan development plan documents are required to be subject to Sustainability Appraisal (SA) including Strategic Environmental Appraisal (SEA) at all key stages. The SA seeks to assess the likely impacts of the policies and proposals of the relevant plan. A full SA was undertaken by independent consultants AMEC at key stages of the Core Strategy preparation. In addition to this, a Habitats Regulations Assessment (HRA) has been undertaken to assess the impact of the policies and proposals set out in Core Strategy on the environmental integrity of the South and North Pennine Moors Special Protection Areas (SPA's) and Special Area's of Conservation (SAC's).



7.3 GREENHOUSE GAS EMISSIONS IMPACTS

The Local Plan is subject to sustainability appraisal throughout its development, which identifies the likely impacts of the plan and where appropriate any mitigation to manage any negative impacts.

Climate change is identified within the document as a key issue and is covered by several policies which seek to reduce greenhouse gas emissions and also manage the potential impacts of climate change.

The consultation and engagement plan will seek to use sustainable means and locations as far as practicable.

7.4 COMMUNITY SAFETY IMPLICATIONS

There are no community safety implications

7.5 HUMAN RIGHTS ACT

The SCI sets out how all individuals can have their say on the development plan documents. Anyone who is aggrieved by a development plan document as submitted has a right to be heard at an independent examination.

7.6 TRADE UNION

There are no Trade Union implications

7.7 WARD IMPLICATIONS

The Core Strategy relates to the whole District and affects all wards.

8. NOT FOR PUBLICATION DOCUMENTS

None.

9. OPTIONS

- 9.1 The Council has a duty under the Planning and Compulsory Purchase Act 2004 to prepare the Local Plan for the District in line with the approved Local Development Scheme. The Council can determine the nature, make up, of the Local Plan it wants to put in place in order to meet its statutory duty, as well as the timetable for their preparation. The currently agreed Local Plan programme, as set out in the approved LDS, commits to 5 Development Plan Documents.



- 9.2 The process for the preparation of each DPD is prescribed by statute and regulation. In order to ensure a sound plan it is important that the Council ensures it follows the regulations, ensures effective and robust consultation, ensures it is founded upon up to date and robust evidence. All DPDs are submitted to the Secretary of State for independent examination to test whether they are sound with reference to the tests set out in legislation and regulations. Failure to ensure a robust approach could result in a DPD being found unsound by the Inspectorate.
- 9.3 Recent national planning reforms retain the need for local planning authorities to prepare a development plan for their district and in light of the National Planning Policy Framework and the provisions for neighbourhood planning the government is seeking Councils to progress as a matter of urgency.
- 9.4 The Executive have 3 options
- 9.5 The first option is to approve the Publication Draft as proposed for submission to government. The document is considered sound by officers and in position to submit to government for examination. This option would continue progress towards the adoption of an up to date development plan in line with the NPPF presumption.
- 9.6 The second option is to not approve the publication draft for submission. This would risk progress to put in place an up to date development plan in line with NPPF and increase uncertainty and confidence in the district for both communities and investors.
- 9.7 The third option is to approve the publication draft as proposed but with further changes as proposed by members. The document in Appendix 1 has been produced to ensure a sound plan and has been subject to separate key tests including Sustainability appraisal. Any changes depending on the significance may require further work to support (NPPF compliance/ Technical evidence) which may delay possible submission.
- 9.8 The Executive are recommended that the version in Appendix 1 is approved in line with Option 1. The other options would have significant implications for the timetable for putting in place an up to date Local Plan.

10. RECOMMENDATIONS

That the Executive recommend to Council

- 10.1 To approve the Publication Draft Core Strategy contained in Appendix 1 and the associated sustainability report for the purposes of submission to the Secretary of State for independent examination pursuant to Section 20 of the Planning and Compulsory Purchase Act 2004.
- 10.2 That prior to submission the publication draft is issued for formal representations for a period of 6 weeks in the New Year.



- 10.3 That the Assistant Director (Planning Transportation and Highways) in consultation with the relevant portfolio holder be authorised to make minor amendments of redrafting or of a similar nature as may be necessary prior to formal publication for representations of the Core Strategy Publication Draft contained in Appendix 1
- 10.4 That delegated authority be given to the Assistant Director Planning Transportation and Highways in consultation with the relevant portfolio holder to submit the document to the Secretary of State once the 6 week period for representations has been completed.

11. APPENDICES

- 11.1 Core Strategy Publication Draft
11.2 Statement of Community Involvement
11.3 Core Strategy Sustainability Appraisal Non technical summary
11.4 Equalities Impact Assessment

12. BACKGROUND DOCUMENTS

Health Impact Assessment
Habitats Regulation Assessment (Urban Edge 2013)
Strategic Housing Land Availability Assessment Update (CBMDC 2013)
Strategic Housing Market Assessment Update (ARC4 2013)
Housing Requirement Study (GVA 2013)
Strategic Flood Risk Assessment (CBMDC 2013)
Retail and Leisure Study (WYG 2013)
Employment Land Assessment Update (CBMDC 2013)
Growth Study (Broadway Malyan 2013)
Local Plan Core Strategy Viability Assessment (DTZ 2013)
Local Infrastructure Plan (CBMDC, ARUP 2013)

