



Agenda for a meeting of the Executive to be held on Tuesday, 11 October 2016 at 10.30 am in Committee Room 1 - City Hall, Bradford

Members of the Executive – Councillors

LABOUR
Hinchcliffe (Chair)
V Slater
I Khan
Ross-Shaw
Ferriby
Jabar

Notes:

- This agenda can be made available in Braille, large print or tape format on request by contacting the Agenda contact shown below.
- The taking of photographs, filming and sound recording of the meeting is allowed except if Councillors vote to exclude the public to discuss confidential matters covered by Schedule 12A of the Local Government Act 1972. Recording activity should be respectful to the conduct of the meeting and behaviour that disrupts the meeting (such as oral commentary) will not be permitted. Anyone attending the meeting who wishes to record or film the meeting's proceedings is advised to liaise with the Agenda Contact who will provide guidance and ensure that any necessary arrangements are in place. Those present who are invited to make spoken contributions to the meeting should be aware that they may be filmed or sound recorded.
- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

From:

Parveen Akhtar

City Solicitor

Agenda Contact: Jill Bell / Yusuf Patel

Phone: 01274 434580/4579

E-Mail: jill.bell@bradford.gov.uk / yusuf.patel@bradford.gov.uk

To:



A. PROCEDURAL ITEMS

1. DISCLOSURES OF INTEREST

(Members Code of Conduct - Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

Notes:

- (1) Members may remain in the meeting and take part fully in discussion and voting unless the interest is a disclosable pecuniary interest or an interest which the Member feels would call into question their compliance with the wider principles set out in the Code of Conduct. Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.*
- (2) Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.*
- (3) Members are also welcome to disclose interests which are not disclosable pecuniary interests but which they consider should be made in the interest of clarity.*
- (4) Officers must disclose interests in accordance with Council Standing Order 44.*

2. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report.



If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Jill Bell / Yusuf Patel - 01274 434580 434579)

3. **APPOINTMENTS TO COMMITTEES AND JOINT COMMITTEES**

(Part 2 of the Constitution – Paragraph 7.11 of Article 7)

To consider any recommendations to appoint Members to Committees of the Executive or Joint Committees.

(Jill Bell / Yusuf Patel - 01274 434580 434579)

4. **RECOMMENDATIONS TO THE EXECUTIVE**

To note any recommendations to the Executive that may be the subject of report to a future meeting. (Schedule to be tabled at the meeting).

(Jill Bell / Yusuf Patel - 01274 434580 434579)

B. STRATEGIC ITEMS

<p style="text-align: center;">LEADER OF COUNCIL & CORPORATE</p>

<p style="text-align: center;"><i>(Councillor Hinchcliffe)</i></p>
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5. **A COUNCIL TAX REDUCTION SCHEME FOR 2017/18**

1 - 8

Legislation requires each Billing Authority to consider, annually, whether it wishes to revise its Council Tax Reduction scheme.

The report of the Finance Director (**Document “Y”**) explores options to revise or retain the current scheme; which may, to a greater or lesser extent, impact on the funding gap forecast in the Medium Term Financial Strategy.

Executive is asked to consider the report and to make a Decision to maintain the current scheme, or alternatively, to make provision for a change to the scheme for 2017/18.



Recommended –

That Executive

- (1) instructs the Director of Finance to continue operating the Council Tax Reduction scheme, without change, for 2017/18 (Option 1 as set out in Document “Y”)**
- (2) requests that the Director of Finance bring a report detailing the options for a new model of Council Tax Support, including an analysis of the impact on the Medium Term Financial Strategy, within the next twelve months**

(Corporate Overview & Scrutiny Committee)

(Martin Stubbs - 01274 432056)

C. PORTFOLIO ITEMS

REGENERATION, PLANNING & TRANSPORT PORTFOLIO

(Councillor Ross-Shaw)

6. LOCAL PLAN CORE STRATEGY - INSPECTORS REPORT AND ADOPTION

9 - 174

The Council is in the process of preparing a new Local Plan which will replace the current statutory development plan for Bradford District (the Replacement Unitary Development Plan) which was adopted in 2005.

The first of the Local Plan documents is the Core Strategy which sets out the strategic approach to managing development and change to 2030. It was submitted for Examination in December 2014 with Hearings held in March 2015. Proposed modifications were published in November 2015 and resumed hearings held in May 2016.

The Council has now received the Inspector’s final Report and recommendations. The Inspector has considered all the matters before him including the plan, the evidence underpinning it, and the objections and representations made and the published modifications. In his report he concludes that the Plan can be considered to be legally compliant and sound, providing a limited set of Main Modifications are made to the plan, as submitted.



The purpose of the report of the Strategic Director Regeneration (**Document “Z”**) is for the Executive to note the contents of the Inspector’s report and to seek authority to proceed to Full Council to request the legal adoption of the modified Core Strategy in line with the Inspector’s recommendation.

Recommended –

- (1) The Executive is recommended to note the contents of Document “Z” and contents of the Inspector’s Report and recommend that Full Council formally adopt the Core Strategy as approved by Full Council on December 2013 and submitted to the government for examination with the Main Modifications contained in Appendix 1, as proposed by the Inspector pursuant to Section 23 of the Planning and Compulsory Purchase Act 2004.**
- (2) That the Assistant Director (Planning Transportation and Highways) in consultation with the relevant Portfolio Holder be authorised to make other minor amendments of redrafting or of a similar nature as may be necessary prior to formal publication.**

(Regeneration, Planning
Transport Overview & Scrutiny) (Andrew Marshall - 01274 434050)

**EDUCATION, EMPLOYMENT & SKILLS
PORTFOLIO**

(Councillor I Khan)

7. INSPECTION OF BRADFORD LOCAL AUTHORITY ARRANGEMENTS FOR SUPPORTING SCHOOL IMPROVEMENT 175 -
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The original review of the effectiveness of current arrangements to support school improvement in Bradford was completed in September 2014 by Professor David Woods. An interim report on progress made towards meeting the recommendations from the initial report was provided to the Committee in September 2015.

The report of the Deputy Director of Children’s Services (**Document “AA”**) is the final part of the reporting cycle: reviewing the progress made towards meeting the outstanding recommendations from the initial report. The report also sets out the next steps in Bradford’s school improvement journey, recognising where achievements have been made and where further work is required.



Recommended -

- (1) **That it be noted that, with the completion of the recommendations by Professor Woods this is the final report on his paper.**
- (2) **That further developments regarding school improvement will be reported through the Education Improvement Strategic Board and the Education Standards report.**

(Children's Services Overview & Scrutiny Committee)
(Judith Kirk – 01274 431078)

8. EXCEPTION TO THE FORWARD PLAN

The following report has not been included on the published forward plan as an issue for consideration. However due to the increasing number of Academy conversions and to enable a policy to be drawn up without delay this report has been drafted as a matter of urgency. As it is impractical to defer the decision until it has been included in the published Forward Plan the report is submitted in accordance with paragraph 10 of the Executive Procedure Rules set out in the Council's Constitution.

9. REQUEST TO THE EXECUTIVE TO CONSIDER THE INTRODUCTION OF A POLICY FOR CHARGING SCHOOLS FOR THE WORK ASSOCIATED WITH ACADEMY CONVERSIONS

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The number of maintained schools in the district converting to academies is rising and capacity for Council services such as Human Resources, Estates and Legal are extremely stretched. As a result, it is proposed that the Authority implements a charging policy. The Director of Children's Services will present **Document "AB"** requesting that approval be given to introduce a charging policy for Academy conversions.

Recommended -

- (1) **That option b contained in Document "AB" is approved, to allow the introduction of a charging policy for Academy Conversions.**



- (2) That the Strategic Director, Children's Services is instructed to develop and implement a charging policy in consultation with the City Solicitor, the Director of Finance and the Portfolio Holder for Education, Employment and Skills.**

(Children's Services Overview & Scrutiny Committee)

(Terry Davis - 01274 437170)

THIS AGENDA AND ACCOMPANYING DOCUMENTS HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER



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Report of the Finance Director to the meeting of the Executive to be held on 11 October 2015

Y

Subject:

A Council Tax Reduction scheme for 2017/18

Summary statement:

Legislation requires each Billing Authority to consider, annually, whether it wishes to revise its Council Tax Reduction scheme.

This report explores options to revise or retain the current scheme; which may, to a greater or lesser extent, impact on the funding gap forecast in the Medium Term Financial Strategy.

Executive is asked to consider the report and to make a Decision to maintain the current scheme, or alternatively, to make provision for a change to the scheme for 2017/18.

Stuart McKinnon-Evans
Director of Finance

Portfolio:

Leader of Council

Report Contact: Martin Stubbs
Assistant Director, Revenues,
Benefits & Payroll
Phone: (01274) 432056
E-mail: martin.stubbs@bradford.gov.uk

Overview & Scrutiny Area:

Corporate

1. SUMMARY

- 1.1. This report explores options to revise or retain the current Council Tax Reduction scheme; which may, to a greater or lesser extent, impact on the funding gap forecast in the Medium Term Financial Strategy.
- 1.2. Executive is asked to consider the report and to make a Decision to maintain the current scheme, or alternatively, to make provision for a change to the scheme for 2016/17.

2. BACKGROUND

- 2.1. The Government abolished Council Tax Benefit and placed a Duty on local authorities to implement a local system of support for Council Tax, with effect from 1 April 2013. The legislation also requires each Billing Authority to consider, annually, whether it wishes to revise its scheme.
- 2.2. Pensioners are governed by a prescribed scheme: any amendment to the CTR scheme, therefore, can only be applied to working age claimants.
- 2.3. Executive considered options to revise or replace the Council Tax Reduction scheme, for the following year, at its 5 November 2013 and 16 September 2014 meetings. The Executive decision, on both occasions, was to continue operating the CTR scheme without change.
- 2.4. At its meeting on 8 December 2015, Council Decision was to adopt a revised CTR scheme for working age claimants for 2016/17 which would "Increase the support provided for Carers in receipt of the Carers Premium, and the disabled in receipt of the Severe or Enhanced Disability Premium, up to 100% of liability". For all other working age claimants, entitlement for support would continue to be assessed on 75% of the net Council Tax liability.
- 2.5. There are a number of significant developments highlighted within this report that Executive will wish to be mindful of when considering whether to retain the current CTR scheme for 2017/18.

3. OTHER CONSIDERATIONS

- 3.1. The CTR caseload (for both pension age and working age claimants) as at the beginning of September is 47,886 (30,100 working age and 17,786 Pension age). This continues the trend of a reducing CTR caseload highlighted in the report to Executive (15 September 2015). The caseload, at the same point in 2015/16 and 2014/15, was 49,611 and 52,392 respectively. These reductions are due, in part at least, to the equalisation of the pension age and the upturn in the local economy.
- 3.2. Of the 30,100 working age caseload, 9,844 are in receipt of a severe or enhanced disability premium or carer premium. This means that, following the introduction of increased protection for this cohort in the 2016/17 scheme, they eligible for support of up to 100% of their Council Tax liability.
- 3.3. The overall in-year collection rate for all Council Tax accounts in 2015/16 was

94.24%, which was slightly higher than the 94.18% collected in 2014/15. We are anticipating that a collection rate of 94.5% will be achieved in 2016/17. For those cases where Council Tax Reduction was awarded, in-year collection for 2015/06 was much lower at 82.9%; which was an improvement over the 78.62% in 2014/15.

- 3.4. However, it is becoming increasingly difficult to collect Council Tax from some low income households, particularly those with multi-year debt; and it is not clear to what extent this improvement will continue.
- 3.5. The following section of this report looks at a number of developments that are likely to inform the development of the CTR scheme and the future of local council tax support nationally.
 - The Summer Budget 2015 introduces some new changes to welfare
 - The roll-out of Universal Credit, which will increase the Council's administrative burden
 - The findings, and recommendations, of a report into the future of Local Council Tax Support schemes

Summer Budget 2015

- 3.6. With effect from April 2017 the Child Element of tax credits and Universal Credit will no longer be awarded for third and subsequent children born after 6 April 2017. The CTR scheme will be updated automatically to reflect this change. However, the Government has, so far, been silent on the detail of how this change will be implemented. Early analysis suggests that, in anticipation of certain exemptions and protections, this could affect as few as 100 households in 2017/18.
- 3.7. The household benefit cap, which limits the amount of benefits out-of-work working-age families can receive, will reduce from £26,000 to £20,000. There are currently around 220 households across the district affected by the current cap. The new, £20,000 cap, is expected to affect approximately further 1,000 households, to varying degrees.
- 3.8. It is expected that households already capped under the current cap limit, will have the new cap applied in November 2016; and that other households will have the cap applied early in 2017. The Government has increased Discretionary Housing Payments funding in anticipation of the increased demand for housing support.

Universal Credit

- 3.9. Universal Credit (UC) across the Bradford district is restricted to working age, single, newly unemployed people. As of the start of August, there were 2,661 individuals/households with a live UC claim. Of these, 279 are in receipt of CTR. Most of those currently receiving UC are not householders and are, therefore, not liable to pay Council Tax.
- 3.10. The planned roll-out of UC to include all working age individuals and families has been delayed; and we await the publication of a revised timeline. Current expectations are that the roll out in the Bradford District will be from October 2017 at the very earliest, but it is more likely to be in 2018 (Pensioners will remain outside the scope of UC).
- 3.11. UC claimants are assessed monthly, and any change in their UC payment is notified to the Council. Consequently, there could be up to 12 notifications per claimant per year; each notification requiring a re-assessment and adjustment of

the claimants' CTR entitlement. The increase in the administrative burden due to the current caseload can be met through existing resources.

- 3.12. As UC is rolled out the Council's administrative burden will increase significantly. Maintaining administrative efficiency and effectiveness will become ever more challenging, and may impact upon our ability to collect council tax effectively and efficiently. It is likely, therefore, that as the uptake of UC increases the Council will need to develop options for a more administratively effective model of CTR.

Review of Local Council Tax Support Schemes

- 3.13. The findings of the Government commissioned report "Three Years On: An Independent Review of Local Council Tax Support Schemes (the Ollerenshaw report) makes a number of recommendations about the future of local council tax support schemes; and the extent to which government should constrain or prescribe such schemes. The Government has yet to respond to the report's recommendations.
- 3.14. Some key recommendations, if enacted, could have a significant bearing on the shaping, administration and funding of future CTR arrangements. Ollerenshaw recommends that government should;
- consider localising at least part of the Local Council Tax Support (LCTS) scheme for pensioners, allowing councils to decide how much support they wish to provide for all low-income residents
 - consider granting more local flexibility over other nationally-set council tax discounts, such as the single person discount
 - confirm that LCTS will remain a local discount scheme for a local tax, and that it will not be rolled into Universal Credit
 - enable LCTS recipients to pay off arrears through a voluntary attachment to benefits agreed with the council, without the requirement to obtain a liability order
 - remove the January 31st deadline for schemes to be agreed on, and replace it with a condition that councils have an LCTS scheme agreed and in place by the end of March each year
- 3.15. If the Government is minded to accept any or all of the recommendations of the report, it is likely that they would not come into effect until after April 2017.

Options for current and future CTR support

- 3.16. There is growing pressure to re-examine CTR provision for the Bradford District. The roll-out of UC is a key driver for that change, with the increasing administrative burden becoming ever more untenable within future financial constraints. In addition, the Government's response to the recommendations of the Ollerenshaw report could allow significant flexibilities that may help in the development of a new scheme that better meets the needs of the Council and the District.
- 3.17. 2017/18 would be too soon to introduce a wholly new scheme. The delay to the roll-out of UC means that the growth in the administrative burden will remain manageable within existing resource during 2017/18, and there has been no Government response to the Ollerenshaw report. However, the development of options for a replacement scheme beyond 2017/18 should be undertaken as soon as is practicable.

- 3.18. The continuation of the current CTR scheme, un-amended for 2017/18, would provide stability, benefiting residents and support and advice workers; and allows for the new protections within the 2016/17 scheme to become better embedded.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1. The forecast cost (Council Tax forgone) for the current year of providing Council Tax Reduction is £33m, with the Council's share amounting to £28m. This is £0.9m more than was estimated when the 2016/17 budget was approved. The additional £0.9m above the forecast is because although the take up of Council Tax Reduction has reduced compared to 2015/16, this reduction is at a slightly lower rate than was anticipated when the tax base was set.
- 4.2. It is important to note that 'Council Tax foregone' quoted in this report includes the Council Tax foregone by the Major Preceptors (Police and Fire). As a general rule, 85% of Council Tax billed is the Council's and 15% goes to the Major preceptors.
- 4.3. Assuming the scheme remains unchanged, the cost of the scheme will rise, broadly speaking, in line with any Council Tax increase. If changes are made to the scheme, this could have the effect of either increasing or reducing the cost of the scheme.
- 4.4. If any revision to, or the replacement of, the scheme has the effect of reducing or removing a reduction to which any class of persons is entitled, the Authority must consider whether transitional protection should be included. The cost of any transitional protection would be determined by the changes proposed.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 5.1. The format and the underpinning principles of current scheme are understood by claimants and those Advice Services and advice workers that support them. Any amendment to the current scheme would be required to adhere to the principles upon which the CTR scheme is based. The Revenues and Benefits Service will work with Advice Services to ensure any such amendment(s), and the implications(s) are known and understood.
- 5.2. If Executive is minded to replace the current scheme with a wholly new scheme, it will be required to re-affirm or revise the set of principles upon which the development of a new scheme is to be based.

6. LEGAL APPRAISAL

- 6.1. A Council tax reduction scheme is made under section 13A(2) Local Government Finance Act (LGFA) 1992 – as amended by the Local Government Finance Act 2012 - and applies to (a) Persons whom the authority considers to be in financial need, or (b) Persons in classes consisting of persons whom the authority considers to be, in general, in financial need. The legislation also requires the Council to consider, annually, whether it wishes to revise its Council Tax Support scheme.

- 6.2. Before making a Council Tax Reduction Scheme and when proposing a

replacement or alteration to an existing scheme the Council must consult with its major pre-accepting authorities i.e. the Police and the West Yorkshire Fire Service. It must then publish a draft of any amended or new scheme and then consult with persons who it considers are likely to have an interest in the operation of the scheme in accordance with schedule 1A para 3 and 5 LGFA 1992 (as amended).

- 6.3. A person with an interest in the operation of the scheme can include those persons who might otherwise have received Council Tax Benefit and now receive Council Tax reductions due to financial need and other Council tax payers generally in the district who do not receive reductions
- 6.4. Any change made to the existing (2016/17) CTR scheme will constitute a new Council Tax Reduction scheme, with effect from 1 April 2017 until such time as the scheme is further amended. Any such revised scheme must be adopted by Full Council by 31 January 2017.

7. OTHER IMPLICATIONS

7.1. EQUALITY & DIVERSITY

- 7.1.1. The Equality and Diversity implications of the current Council Tax Reduction scheme were considered as part of the Council's decision making process. If any changes to the scheme are proposed by Executive, consultation will be undertaken, together with an Equality Impact Assessment, to inform the Council's decision.

7.2. SUSTAINABILITY IMPLICATIONS

- 7.2.1. There are no Sustainability implications directly arising from this report. Any considerations that arise as a result of decisions made by Executive following this report will be addressed within the context of those decisions.

7.3. GREENHOUSE GAS EMISSIONS IMPACTS

- 7.3.1. There are no greenhouse gas emissions impacts.

7.4. COMMUNITY SAFETY IMPLICATIONS

- 7.4.1. Not applicable within the context of this report.

7.5. HUMAN RIGHTS ACT

- 7.5.1. There are no Human Rights implications arising from this report. Any considerations that arise as a result of decisions made by Executive following this report will be addressed within the context of those decisions.

7.6. TRADE UNION

- 7.6.1. Not applicable within the context of this report.

7.7. WARD IMPLICATIONS

- 7.7.1. There are no Ward implications directly arising from this report. However, any variance to, or move away from, the current Council Tax Reduction scheme will impact on households across the district; and the change will impact variably across the district.

7.8. AREA COMMITTEE ACTION PLAN IMPLICATIONS

- 7.8.1. Not Applicable

8. NOT FOR PUBLICATION DOCUMENTS

8.1. None

9. OPTIONS

9.1. **Option 1** - Retain the Council Tax Reduction scheme, without change, for 2017/18.

9.1.1. Pros

- Administrative procedures; ICT, Staffing etc., are already in place. This makes it easier & quicker to administer.
- This will not affect the Council's funding position unless there is a significant increase or decrease in the number of claimants
- Provides stability, benefiting residents and support and advice workers; and allows for the new protections within the 2016/17 scheme to become better embedded
- No further consultation on the scheme required

9.1.2. Cons

- Opportunities to increase Council Tax revenue, or to apply some further degree of support to certain groups, cannot be realised
- Council tax arrears will grow as the average weekly liability continues to be above the maximum weekly deduction from benefits

9.2. **Option 2** – Change the scope and/or level of support provided by the CTR scheme.

9.2.1. Pros

- This could increase the protection already afforded to vulnerable groups when calculating entitlement. If protection is increased, fewer residents will find themselves indebted and Council debt would reduce as the percentage moves closer to 100%. This will provide a reduction in recovery costs
- Alternatively, reducing support for some or all groups would reduce the cost of the scheme. Reducing the cost of the scheme would impact positively on the budget deficit identified in the Medium Term Financial Strategy and/or protections for certain groups could be increased without increasing the overall cost of the scheme

9.2.2. Cons

- Increasing support, if not off-set by other changes, will mean reducing the Council Tax base, and, therefore, the amount of Council tax raised; impacting adversely on the funding gap forecast in the Medium Term Financial Strategy
- The cost of protection becomes more burdensome, either for the Council and Major Preceptors or for other working age Taxpayers, as support is broadened or the level increased
- Reducing protection(s) could increase the likelihood of indebtedness and poverty in the selected groups
- Consultation on the new scheme is required

9.3. **Option 3 – Develop a wholly new Council Tax Reduction scheme**

9.3.1. Pros

- A new scheme could be developed that is;
 - less complex and less costly to administer

- less open to misinterpretation and error
- easier for residents and support agencies to understand
- better able to target support

9.3.2. Cons

- The business case for introducing a wholly new scheme for 2017/18 is uncertain; and such a new scheme may be subject to further revision in light of UC and the Government's response to the Ollerenshaw report.
- The current administrative burden created by UC is manageable within existing resources, and is likely to remain so until UC is more fully rolled out. The recently announced delays to the UC roll out programme suggests that the full service will not be introduced in the Bradford District until Autumn 2017 at the earliest, and is more likely to be during 2018
- The Government's response to the recommendations of the Ollerenshaw report is likely to be a significant factor in the development of options for a new scheme. Government is, to date, silent on the matter; and the timing of its response is unknown
- The timing of the development of a new scheme, therefore, would be better sequenced to the roll out of UC, and at a point where the Council is able to take advantage of any new freedoms that government's response to the Ollerenshaw report might provide.
- Consultation on the new scheme with the Major Preceptors (Police and the West Yorkshire Fire Service) and the public is required

10. **RECOMMENDATIONS**

That Executive,

- instructs the Director of Finance to continue operating the Council Tax Reduction scheme, without change, for 2017/18 (Option 1)
- requests that the Director of Finance bring a report detailing the options for a new model of Council Tax Support, including an analysis of the impact on the Medium Term Financial Strategy, within the next twelve months

11. **APPENDICES**

None

12. **BACKGROUND DOCUMENTS**

- Local Government Finance Act 2012
- Localised Council Tax Support: Executive Report, 1 December 2015
- Localised Council Tax Support: Executive Report, 15 September 2015
- CBMDC Council Tax Reduction scheme
- CBMDC Medium Term Financial Strategy
- Three Years On: An Independent Review of Local Council Tax Support Schemes. Eric Ollerenshaw OBE, March 2016
- Summer Budget 2015: HM Treasury, July 2015

Report of the Strategic Director Regeneration to the meeting of Executive to be held on 11 October 2016.

Subject: Local Plan Core Strategy - Inspectors Report and Adoption

Summary statement:

Z

The Council is in the process of preparing a new Local Plan which will replace the current statutory development plan for Bradford District (the Replacement Unitary Development Plan) which was adopted in 2005.

The first of the Local Plan documents is the Core Strategy which sets out the strategic approach to managing development and change to 2030. It was submitted for Examination in December 2014 with Hearings held in March 2015. Proposed modifications were published in November 2015 and resumed hearings held in May 2016.

The Council has now received the Inspector's final Report and recommendations. The Inspector has considered all the matters before him including the plan, the evidence underpinning it, and the objections and representations made and the published modifications. In his report he concludes that the Plan can be considered to be legally compliant and sound, providing a limited set of Main Modifications are made to the plan, as submitted.

The purpose of this report is for the Executive to note the contents of the Inspector's report and to seek authority to proceed to Full Council to request the legal adoption of the modified Core Strategy in line with the Inspector's recommendation.

Julian Jackson
Assistant Director Planning
Transportation and Highways

Portfolio:
Regeneration, Planning and Transport

Report Contact: Andrew Marshall
Phone: (01274) 434050
E-mail: Andrew.marshall@bradford.gov.uk

Overview & Scrutiny Area:
Environment and Waste Management

1. SUMMARY

- 1.1 The Council is in the process of preparing a new Local Plan which will replace the current statutory development plan for Bradford District (the Replacement Unitary Development Plan) which was adopted in 2005.
- 1.2 The first of the Local Plan documents is the Core Strategy which sets out the strategic approach to managing development and change to 2030. It was submitted for Examination in December 2014 with Hearings held in March 2015. Proposed modifications were published in November 2015 and resumed hearings held in May 2016.
- 1.3 The Council has now received the Inspector's Final Report and recommendations. The Inspector has considered all the matters before him including the plan, the evidence underpinning it, and the objections and representations made and the published modifications. In his report he concludes that the Plan can be considered to be legally compliant and sound, providing a limited set of Main Modifications are made to the plan, as submitted.
- 1.4 The purpose of this report is for the Executive to note the contents of the Inspectors report and to seek authority to proceed to Full Council to request the legal adoption of the modified Core Strategy in line with the Inspector's Recommendation.

2. BACKGROUND

- 2.1 In accordance with the Planning & Compulsory Purchase Act 2004 and National Planning Policy Framework (NPPF), the Council is in the process of preparing an up to date Local Plan for the Bradford District. The Local Plan will ultimately supersede the current Replacement Unitary Development Plan (RUDP) (as saved by the Secretary of State October 2008). It will set out the policies against which development proposals are tested, as well as allocating land for homes, economic development and supporting infrastructure. It will also review other local designations such as open space and heritage assets etc. The Council is committed to produce the following suite of Development Plan Documents which will make up the Local Plan:
 - Core Strategy
 - Allocations Development Plan Document (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 Council is now making significant progress towards putting in place a new Local Plan, in particular with the receipt of the Inspector's report into the Core Strategy. Given the complex challenges and the context of changes to national planning policy, the receipt of the report and recommendation allowing it's adoption is a major milestone.

- 2.3 The Core Strategy provides the spatial vision and objectives for the District to 2030 and includes strategic policies to inform future development proposals. It also provides direction as to the approach, development targets and policies to be contained within the other parts of the Local Plan such as the Area Action Plans and the Allocations DPD. Without an adopted Core Strategy, progress in preparing the other Local Plan documents, which will themselves deliver the regeneration, investments, infrastructure and housing development required, will be undermined. The Core Strategy once adopted will also shape investment decisions and assist the Council in making successful bids for resources. Utility and infrastructure providers will be given a greater level of certainty as to the level and distribution of development planned and this will in turn enable them to plan more effectively and to secure funding for projects which will benefit the District. This is extremely significant given the understandable concerns raised by those who made representations during the Core Strategy process, as to how the Council would manage change and ensure that development is matched by supporting infrastructure.
- 2.4 The Core Strategy thus provides a fundamental framework to plan for the homes and jobs the District needs in a sustainable manner and in locations which respects local character and the distinctiveness of the diverse communities across the Bradford District. However, the Plan covers a much wider range of issues than just those of housing and employment development. It provides a strategic set of policies on a range of issues key to delivering sustainable development, including environmental protection and enhancement, addressing climate change and supporting low carbon development, place making and design quality. The Core Strategy in this respect needs to be considered as whole in planning for growth and development in the District to 2030.
- 2.5 The Core Strategy has been in preparation for a number of years and subject to extensive formal and informal consultation and is supported by a range of technical studies and assessments which have been published and used to inform the content and approach in line with national guidance. The formal stages of consultation prior to submission included:
- Issues & Options (2007)
 - Further Issues and Options (2008)
 - Core Strategy Further Engagement Draft (FED) (2011 – 2012)
 - Core Strategy Publication Draft (2014)
- 2.6 The Core Strategy was approved for submission to the government for examination by Full Council in December 2013, which was then followed by its publication for formal representations. The Core Strategy and the representations were submitted to the government in December 2014. The appointed Inspector Mr Stephen Pratt held hearings in March 2015 into a number of key matters and issues. Following the hearings further changes to the Plan were considered necessary to ensure the Core Strategy would be 'sound' (in line with national guidance, justified, effective and positively prepared) and capable of legal adoption. These Main Modifications were published by the Council in November 2015 for representations. The Inspector held a number of further hearings in May 2016 to consider a limited number of matters raised through the representations to the Main Modifications. A further set of very limited changes were proposed to the Main Modifications following these hearings. The Council received the Inspector's Report on 22 August 2016 and made it

available for information on 5 September (see Appendix 1). The receipt of the Inspector's Report marks the final step prior to formal adoption.

Main Issues

- 2.7 The role of the Inspector was to consider all the relevant matters before him (including all issues in the formal representations) and the supporting evidence base and thus conclude whether the Plan could be considered to be legally compliant and 'sound' and therefore capable of legal adoption by the Council.
- 2.8 In order to help the Inspector reach a conclusion and to allow all relevant parties to contribute to the debate, an Examination in Public was held. As noted above this involved a limited set of hearings, the nature, content and management of which were determined by the Inspector. The hearings covered matters and questions which the Inspector considered required further exploration and they allowed those with concerns to provide further information linked to the matters and issues determined by the Inspector. Further statements and information were produced as part of the examination process at the request of the Inspector and made available on the examination web site. This allowed adequate opportunities for all parties to ensure the Inspector fully understood and considered their issues/concerns as part of his formal considerations and in coming to his conclusion and recommendation.
- 2.9 In his report the Inspector concluded that he considers that the Core Strategy as approved by Full Council to provide an appropriate basis for the planning of the District but only provided that a number of Main Modifications (MM) are made to it. The Council specifically requested that the Inspector consider any potentially necessary Main Modifications as part of the examination process. To this end the Council proposed Main Modifications which were subject to separate consultation.
- 2.10 The Inspector has concluded that with the recommended Main Modifications set out in the Appendix to his report, the Core Strategy Development Plan Document satisfies the requirements of Section 20(5) of the 2004 Act, meets the criteria for soundness in the National Planning Policy Framework, and is capable of adoption.
- 2.11 The Inspector's Report sets out the reasons for his conclusion and why he considers the Main Modifications are necessary (see in particular the Non-Technical Summary). The full Inspector's Report and Appendix can be found in Appendix 1 to this report. Below a number of the major issues are highlighted and outlined with reference to the Inspector's Report and conclusions.
- 2.12 It is worth noting that whilst there are numerous Main Modifications set out in the schedule appended to his report, the vast majority of the Core Strategy as submitted has been accepted by the Inspector and remains unchanged.

Legal compliance

- 2.13 The Inspector has concluded that the Council has complied with legal requirements in the preparation of the document including the approach to consultation and engagement, national policy, sustainability appraisal and legal/regulatory requirements. Concerns which were raised in the initial Examination hearings of

March 2015 with regards to the Habitats Regulation Assessment and its subsequent impacts on a number of policies – concerns which if left unaddressed could have rendered the plan incapable of adoption - were rectified through a review as part of the Examination (see paragraph 2.21 – 2.22 below).

Duty to cooperate

- 2.14 During the course of the Core Strategy's preparation the Council had to respond to a number of changes to the planning system and to new procedural requirements. One such key change which followed on from the revocation of Regional Spatial Strategies, was the need to meet the new duty to cooperate. In the absence of formal regional planning the duty ensures that councils prepare their strategic plans in consultation and co-operation with neighbouring Local Planning Authorities (LPAs) and specified statutory bodies.
- 2.15 A number of concerns by those making representations were raised regarding compliance with this duty including scales of development, cross boundary impacts (green belt, transport and other infrastructure). The matter was subject to a specific Examination hearing. Having considered all the evidence and the discussions at the hearing the Inspector concludes that the Council has met this duty in terms of maximising the effectiveness of the plan making process and actively co-operating and engaging with relevant bodies on an on-going basis. It is worth noting that his conclusion relates to the Core Strategy and further on-going work will take place on strategic/cross boundary impacts and on-going liaison with adjoining LPAs as part of the more detailed Local Plan documents in particular the Allocations DPD.

Spatial Vision and Development Strategy

- 2.16 One of the key roles of the Core Strategy is to set out a clear spatial vision which in turn then determines the Plan's objectives and the proposed spatial distribution of development. The focus of the Plan is to support the role of the Regional City of Bradford and secure its on-going regeneration and to that end the majority of new development proposed in the Plan is focused on Bradford and to a lesser extent the Principal Towns of Keighley, Ilkley and Bingley. The Plan however also highlights the need to support development and investment of the network of smaller settlements within the District whilst also protecting the environment. Having considered a range of representations suggesting alternative approaches, the Inspector has supported the overall approach and spatial priorities contained within the spatial vision, and the objectives and Strategic Core Policies. He has supported the need for a focus on the urban area of the City of Bradford and its regeneration, and the proposed distribution of development. In doing so he rejected calls for differing approaches to the distribution of development, rejected calls for development quantum to be further adjusted (over and above those adjustments already put forward in the Main Modifications) and supported the Plan's approach relating to infrastructure which included the preparation of a comprehensive Local Infrastructure Plan (LIP).
- 2.17 The approach to the location of development (Policy SC5) has been supported including the need to prioritise brownfield land, but it is important to stress that the Inspector has fully accepted the Council's arguments that bearing in mind the scale of housing required and the nature of the available and deliverable land supply a substantial contribution from green field and Green Belt land will be needed to

deliver the District's development needs in full. However, the Inspector has also accepted the importance of the prioritisation of the use of brown field land within the District, as set out in Policies SC5 and HO6. While national planning guidance does not allow a brownfield first policy there are still many ways in which the Council can use its plans, investment programmes and strategies to encourage the use of brownfield sites and the Inspector has endorsed the Council's policies and approach as balanced and in conformity with the NPPF.

Green belt

- 2.18 As indicated above, one of the key issues which has been the subject of a significant number of representations, has been the need to make changes to the Green Belt in order to ensure that the District's development needs are met. It is important to stress that the Government's guidance contained within the NPPF does allow for councils to make changes to the Green Belt when preparing a new Local Plan, but only if certain tests are met and if the evidence supports and justifies such an approach. In particular, the Council are required to demonstrate that 'Exceptional Circumstances' exist which justify Green Belt changes and that the Council has fully considered the environmental and sustainability implications of making such changes.
- 2.19 The Inspector in this respect thoroughly examined whether the Council had demonstrated 'Exceptional Circumstances' to support a review of the Green Belt as required by NPPF. The Council's evidence set out that Green Belt change was required in order to fully meet the development needs for housing, and support regeneration and long term economic success of the District. The evidence on land supply in the Strategic Housing Land Availability Assessment (SHLAA) confirmed that there was insufficient land outside the Green Belt to fully meet the identified housing needs. Other evidence confirmed that there was land available in the Green Belt in sustainable locations which if developed would not undermine the functions and purpose of Green Belt. Having considered the evidence and also the differing views of those who made representations, the Inspector has concluded that the Council has indeed demonstrated that 'Exceptional Circumstances' to change the Green Belt exist and that the Council has considered whether it would be appropriate to make such changes – in particular that such changes can be made in a sustainable manner. However, in order to clarify the process and approach taken the Inspector has asked for a number of changes and additions to the supporting text within the Plan which are set out in one of the published Main Modifications.
- 2.20 The Inspector also considered the need to allocate Safeguarded Land as advocated by some objectors, in order to ensure a Green Belt boundary when reviewed which could last beyond the plan period. The Inspector was content that the revised boundaries could endure beyond the plan period and any longer term review of the Green Belt would need a more strategic approach across the sub region as part of future plans.

South Pennine Moors SAC/SPA

- 2.21 One of the key issues which was subject to objection and thus debate within the Core Strategy examination was whether the submitted plan had taken the right approach to the protection of the South Pennine Moors Special Area of

Conservation (SAC) and Special Protection Area (SPA) and whether the Plan had been informed by an appropriate and robust Habitats Regulations Assessment (HRA). This in turn linked to representations which were concerned that the approach taken had been unnecessarily precautionary leading to housing targets for certain settlements (mainly in Wharfedale) which were lower than could be justified and to concerns over other policies such as those relating to the Plan's settlement hierarchy.

- 2.22 Having reviewed the original policy approach and the original HRA and other evidence the Inspector concluded there were some deficiencies. In order to address these concerns the Council with its consultants and Natural England reviewed and revised the HRA and in light of the revised HRA amended the approach under Policy SC8. The Council also reviewed the implications for the settlement hierarchy (Policy SC4) and the spatial distribution of development as set out in particular within Policy HO3.

Housing

- 2.22.1 One of the most important aspects of a strategic plan is to undertake an objective assessment of the level of new housing which will be needed in the District over the plan period. The setting of a housing requirement has been an issue which has caused problems to the progress of a large number of plans across the country over recent years with some having their plans rejected outright due to Inspector's concerns that plans were failing to identify and provide for the full extent of need in their areas. Within Bradford's Core Strategy a range of evidence including Government issued population and household projections, migration trends, economic and jobs growth projections, housing market information and data on past housing delivery has been used to conclude that over the period to 2030 at least 42,100 new homes will be required.
- 2.23 The Inspector has considered the evidence produced and the widely differing views expressed by different objectors and concluded that the Council's approach to assessing housing need is consistent with NPPF and National Planning Policy Guidance (NPPG). In particular, the Inspector has confirmed that the Council has considered the required wide range of factors set out in the NPPG and not just the Government's population and household projections which are nonetheless a key element. The Inspector has fully considered the issues raised by those who sought to either increase or reduce the housing requirement and concluded that the Council's approach is sound.
- 2.24 The Inspector has confirmed that as required by the NPPF, the Core Strategy should plan positively to boost housing delivery but in this respect has asked for a Main Modification which provides a revised housing trajectory in one of the Core Strategy's appendices. The revised trajectory reflects the need to boost delivery in the early part of the plan period, in recognition of the existence of a backlog of unmet housing need and the current lack of a 5 year land supply.
- 2.25 The scale and distribution of development (Policy HO3 and Sub Area policies) proposed by the Core Strategy to meet the housing requirement was broadly supported by the Inspector but subject to several Main Modifications which take account of the revised HRA, an updated land supply position in the latest Strategic Housing Land Availability Assessment (SHLAA) and the need to address concerns

raised by Historic England about impact on the Saltaire World Heritage Site and Haworth Conservation Area. This resulted in a limited number of settlements having their housing targets increased (Burley In Wharfedale, Menston, Ilkley, and Silsden) and others slightly reduced (Shipley, Bradford North East, the Canal Road Corridor, Haworth, and Baildon). These changes were included in the Main Modifications published and representations to the changes considered at the further hearings held in May 2016.

- 2.26 The Inspector supported the identification of Holme Wood as an urban extension, the exact scale to be determined through the Land Allocations Development Plan Document.
- 2.27 The broad approach to the settlement hierarchy (Policy SC4) was supported by the Inspector though the classification of two settlements (Burley in Wharfedale and Menston) are proposed to be modified to reflect the changes in scales of development and returned to their previous proposed status as Local Growth Centres. The fact that the settlements of Burley in Wharfedale and Menston had only been downgraded from Local Growth Centres to Local Services Centres on the back of the deficient HRA was accepted by the Inspector thus requiring the Council's to propose a Main Modification not only to the HRA related policy but also to the settlement hierarchy and proposed scale of housing proposed within Wharfedale. While the modifications to increase housing targets within parts of Wharfedale raised a significant number of representations it is important to note that the modifications made only modest changes to the overall housing distribution and the focus of the Plan remains overwhelmingly focused on the main urban areas. This is illustrated by the fact that the modified plan proposes that the Regional City of Bradford will see 27,750 new homes (66% of the district wide requirement) as compared to 2,500 (5.9%) within Wharfedale.
- 2.28 In other sections of his report the Inspector has confirmed, subject to the inclusion of a number of Main Modifications the approach to:
- Affordable housing (Policy HO11) with minor change to the threshold for small sites to reflect changes in national policy;
 - Phasing the release of housing sites(Policy HO4);
 - Density of development (Policy HO5);
 - Prioritisation of development on brownfield land (Policy HO6); and
 - Housing standards (policy HO9) with changes to bring into line with new national housing standards.

Infrastructure

- 2.29 The Core Strategy's sub area policies (which summarise and highlight the priorities and policies in each area) were subject to extensive consideration at the hearings in March 2015 and examined again in light of proposed Main Modifications in May 2016. As well as considering the issues relating to the proposed scale and distribution of development and the role of individual settlements as noted above, the Inspector considered the concerns raised in most communities regarding ability of Infrastructure to accommodate the scale of development proposed. The Inspector considered fully the Council's evidence in particular the Transport Study and Local Infrastructure Plan. He concluded that the Council had considered as far

as possible the critical infrastructure and improvements necessary (including highlighting key elements within the Sub Area policies) and emphasised that the process of assessing and planning for such infrastructure would continue through on-going liaison with key infrastructure providers and as the Council develops the Allocations Development Plan Document. The Inspector also noted that in some cases new development can enhance or improve existing facilities and services as well as providing new facilities.

Flooding

- 2.30 Flooding was a key concern in a number of communities which was considered fully by the Inspector who supported the Councils approach as being in line with NPPF and NPPG and appropriate to the strategic nature of the Plan. He noted that many areas are at risk of to flooding from rivers, groundwater and surface water. The Core Strategy was supported by a Strategic Flood Risk Assessment (SFRA) level 1 which considered all sources of flooding as well as a sequential testing paper which concluded that the proposed development targets could in the majority of settlements be met entirely on sites in the lowest areas of fluvial flood risk (flood zones 1 and 2). The Inspector noted that further work would take place as part of the Land Allocations Development Plan Document on a site by site basis. Detailed policy guidance on flood risk is contained in Core Strategy Policy EN7.

Economic Development

- 2.31 The approach to economic development including the provision of a supply of new employment land of 135Ha was supported with Main Modifications to provide clarity on the job projections to reflect those used in the Leeds City Region (LCR) Regional Econometric Model and their use in the housing needs projections.

Environment

- 2.32 The wide range of environmental policies were supported by the Inspector, with only a limited number of small changes to policy to provide clarification or align with changes to Policy SC8.

Minerals and Waste

- 2.33 The approach to minerals and waste was support with a small number of changes.to the policies and the inclusion of more background information in the lower case text on the minerals and waste needs.

Adoption

- 2.34 The Core Strategy as proposed to be modified provides a clear and up to date context for the Land Allocations Development Plan Document as well as supporting the approach in the two Area Action Plans, Waste Management Development Plan Document currently due to be discussed at their own examinations during the coming months. The adoption of the Core Strategy would also clarify the policy context for the local communities who wish to progress Neighbourhood Plans.

Minor modifications

- 2.35 During the Examination a number of minor changes (in addition to what have been termed 'Main Modifications') were also considered. An additional schedule of these changes was published with the proposed Main Modifications in November 2015. The minor changes relate to editorial issues and matters of presentation or fact. These will be incorporated into the Plan if adopted together with the Main Modifications.

Adoption Process

- 2.36 Assuming the Core Strategy is adopted, following resolution by Full Council, it will form a part of the statutory Local Plan for the District. It will become a key document in the determination of planning applications. It will replace many of the existing saved policies of the RUDP. A full schedule of the RUDP policies and their status on adoption of the Core Strategy has been produced as part of the examination and is available to view on the Council's web site (SD/010).
- 2.37 It is important to stress that the policies within the RUDP were prepared a considerable time ago and over time will become ever more vulnerable to challenge. This includes policies to protect key environmental assets such as green spaces, as well as those policies which relate to development. The adoption of the Core Strategy will provide policies which have been prepared in the light of current government guidance and up to date evidence and which will therefore provide a more robust basis for the Council's decision making when considering planning applications. Should the Core Strategy be delayed or not adopted there is a much greater risk of successful challenges to the Council's decisions, increased numbers of planning appeals and associated increased costs and greater loss to development of green field sites.
- 2.38 If the Core Strategy is adopted by Full Council in line with the Inspector's recommendations with all the proposed Main Modifications the Council will then publish an Adoption Statement. Following this there is a 6 week period allowed for any party to legally challenge the Council's decision to adopt.

3. OTHER CONSIDERATIONS

- 3.1 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 (LDS). The Council can determine the nature and 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 its' preparation. The currently agreed Local Plan programme, as set out in the approved LDS, commits to 5 Development Plan Documents (see paragraph 2.1).
- 3.2 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, and 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 unsound and not capable of adoption. The Inspector has considered fully the legal compliance and soundness and concluded that the Core Strategy as proposed to be modified is sound and can be adopted by the Council. However he has also confirmed that the original plan submitted to the Planning Inspectorate without the proposed Main Modifications would not be considered 'Sound'. The importance of accepting and incorporating, in full, the schedule of Main Modifications to ensure that the Plan can be adopted should therefore be emphasised.

- 3.3 Once the examination process is complete, adoption is the final stage of putting a Local Plan in place. This requires confirmation by a full meeting of the Local Planning Authority (Regulation 4(1) and (3) of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000). On adopting a Local Plan, the Local Planning Authority has to make publicly available a copy of the Plan, an Adoption Statement and Sustainability Appraisal in line with regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.4 Government guidance states that while the Local Planning Authority is not legally required to adopt its Local Plan following examination, it will have been through a significant process locally to engage communities and other interests in discussions about the future of the area, and it is to be expected that the authority will proceed quickly with adopting a plan that has been found sound.
- 3.5 National Planning Policy continues to emphasise the need for Local Planning Authorities to prepare an up to date development plan for their district and more recent government statements are seeking councils to progress as a matter of urgency.
- 3.6 The Housing and Planning Act 2016 re-emphasised the need for Local Planning Authorities to make progress to put in place up to date local plans and introduced new powers for the Secretary of State to intervene where sufficient progress was not being made. In a statement to Parliament (July 2015) the then Minister of State for Housing and Planning (Brandon Lewis) made clear the government's commitment to getting Local Plans in place. To this end, the government will publish league tables setting out local authorities' progress on their Local Plans. In cases where no Local Plan has been produced by early 2017 the government will intervene to arrange for the Plan to be written, in consultation with local people, to accelerate production of a Local Plan under the new provisions in the Housing and Planning Act 2016. The adoption of the Core Strategy would be a major step forward in meeting this requirement and demonstrating to government the District's commitment to producing an up to date Local Plan. It will therefore enable the Council in conjunction with local communities and stakeholders to maintain control over decisions on the future planning of the District.
- 3.7 The NPPF presumption 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

- 3.8 The RUDP was adopted in 2005 and most of its policies saved in 2008. The RUDP plan period was only until 2014 and had a land supply which reflected much lower levels of housing need than that which is now required to be delivered. .
- 3.9 The land supply elements of the RUDP are therefore already considered as out of date. Although many of its saved policies accord with NPPF, there is also a danger, as indicated above, that the age of the RUDP will result in more of its policies being superseded as time goes on if not replaced and refreshed by the new Local Plan.
- 3.10 The reliance on the remaining unimplemented RUDP housing site allocations together with other more recent planning consents means that the Council is and will continue to be unable to demonstrate as required by the NPPF that it has an appropriate supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 20% (moved forward from later in the plan period), to ensure choice and competition in the market for land. In such circumstances paragraph 14 of the NPPF (see paragraph 3.7 above) applies.
- 3.11 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. Given the scale of the housing requirement the only way the District can ensure a 5 year supply is to allocate more land through the new Local Plan. The adoption of the Core Strategy will allow for progress to be made towards the allocation of sustainable sites within the two Area Action Plans and the Allocations DPD.
- 3.12 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. Delay will also impact on the progress on the two Area Action Plans which support key regeneration areas as well as the wider Land Allocations work which will put in place the up to date supply of land to meet the need for homes and jobs.
- 3.13 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 Planning and Transport Strategy Service, which is funded from within the Department's resources, supported by 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;
- reduced prospects for securing funding for new infrastructure;
- Loss or reduction of New Homes Bonus from Government
- increase in the number of successful planning appeals with attendant increased costs;
- possible government intervention to externalise plan making; and
- failure to meet key needs for homes and jobs.

5.2 The receipt of the Inspector's Report and recommendations allowing adoption mean the Council is in a position to be able to put in place an up to date development strategic planning framework for the District which will form part of the statutory Local Plan and provide a starting point for the consideration of planning applications. It will also provide the strategy and framework for the production of other Local Plan documents. It will also provide confidence and clarify to the development sector as well as business and communities and allow infrastructure providers to be clear about the scale and distribution of development they need to support through their investment plans and decisions.

5.3 As with submission to examination the decision whether to adopt the Core Strategy is for Full council.

6. LEGAL APPRAISAL

6.1 The Local Plan is prepared in line with the appropriate, legislation (UK and EU), regulations and guidance, in particular the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2012 and Planning and Housing Act 2016. The Submitted plan was supported by a legal compliance check list and the Inspector concluded that the submitted plan was legally compliant.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

The consultation on the local plan is undertaken in line with the Statement of Community Involvement (SCI), 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 Local Plan documents are subject to an Equality Impact Assessment which was submitted with the Core Strategy to examination.

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. The Inspector considered the SA and SEA and concluded that they met the legal and regulatory requirements.

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 Core Strategy 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.

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. The Submission Statement sets out the stages of engagement and a summary of the key issues raised together with the Council's response. The two sets of hearings held by the Inspector allowed for any individual with a representation to have their concerns heard as well as considered through the written documents.

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 Executive have 3 options.

Options1

9.2 The first option is to approve the Core Strategy in line with the Inspector's Report and recommendations including the complete set of Main Modifications contained in the Appendix to the Inspector's Report. The document is considered 'Sound' and legally compliant by the Inspector and capable of adoption only with the proposed Main Modifications.

Option 2

- 9.6 The second option is to attempt to adopt the Core Strategy but not to include all the Main Modifications or with different changes. There is a strong likelihood that such a course of action would fail and result in successful legal challenge as the Inspector has made clear that the Main Modifications are all required in order to produce a 'Sound' and legally compliant plan, which is capable of adoption;

Option 3

- 9.7 The third option is to not adopt the Plan and to review the document. In effect this would amount to a withdrawal of the Plan in total as the Inspector has now concluded his examination. This would delay significantly the adoption of the Local Plan having particular implications for the site allocation documents as well as Neighbourhood Plans. As well as delay of up to 3-4 years to go back through the process there would also be significant additional costs to the Council. There would also be a risk of intervention by the government. In the meantime the District would continue to lack a 5 year supply of housing land and lose control influence over of development proposals in the District. During the course of the production of the Core Strategy considerable sums have been invested in the Plan's preparation including the production and commissioning of evidence and the holding of an Examination in Public. Failure to adopt the Core Strategy would lead to significant cost as much of the evidence associated with the document would have to be updated or prepared afresh, further consultation would have to be undertaken and a new examination would need to be held and paid for.
- 9.8 The Executive are therefore recommended to follow Option 1 and recommend to Full Council that the Core Strategy as submitted be adopted with the Main Modifications proposed by the Inspector for the reasons set out in his report and also this report. The other options would have significant serious implications for the timetable for putting in place an up to date Local Plan and associated risks to both the Council and the District and its communities.

10. RECOMMENDATIONS

- 10.1 The Executive is recommended to note the contents of this report and contents of the Inspector's Report and recommend that Full Council formally adopt the Core Strategy as approved by Full Council on December 2013 and submitted to the government for examination with the Main Modifications contained in Appendix 1, as proposed by the Inspector pursuant to Section 23 of the Planning and Compulsory Purchase Act 2004.
- 10.2 That the Assistant Director (Planning Transportation and Highways) in consultation with the relevant Portfolio Holder be authorised to make other minor amendments of redrafting or of a similar nature as may be necessary prior to formal publication.

11. APPENDICES

- 11.1 Report on the examination of the Local Plan for the Bradford District Core Strategy Development Plan Document and Appendix (containing the Main Modifications).

12. BACKGROUND DOCUMENTS

- 12.1 Local Development Scheme (July 2014)
- 12.2 Publication Draft Core Strategy
- 12.3 Additional Modifications (November 2015)
- 12.4 National Planning Policy Framework
- 12.5 National Planning Policy Guidance

Appendix 1

Inspector's Report into the examination of the Local Plan for the Bradford District Core Strategy Development Plan Document and Appendix (containing the Main Modifications).

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Report to the City of Bradford Metropolitan District Council

by Stephen J Pratt BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 22 August 2016

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Local Plan for the Bradford District Core Strategy Development Plan Document

The Plan was submitted for examination on 12 December 2014

The examination hearings were held between 4-20 March 2015 & 17-20 May 2016

File Ref: PINS/W4705/429/7

Abbreviations used in this report

AAP	Area Action Plan
AONB	Area of Outstanding Natural Beauty
BCS	Local Plan for Bradford District – Core Strategy DPD
CBMDC	City of Bradford Metropolitan District Council
CIL	Community Infrastructure Levy
DCLG	Department for Communities & Local Government
DPD	Development Plan Document
DTC	Duty to Co-operate
dw/yr	dwelling per year
EA	Environment Agency
EH/HE	Historic England (formerly English Heritage)
ELS	Employment Land Study
FED	Bradford Local Plan Core Strategy – Further Engagement Draft
G&T	Gypsy and Traveller
GTAA	Gypsy & Travellers Accommodation Assessment
ha	hectares
HA	Highway Authority
HE	Highways England (formerly Highways Agency)
HCA	Homes & Communities Agency
HFR	Household Formation Rates
HRA	Habitats Regulations Assessment
HWTNDP	Holme Wood & Tong Neighbourhood Development Plan
LAA	Local Aggregates Assessment
LCR	Leeds City Region
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LIP	Local Infrastructure Plan
LTP	Local Transport Plan
MM	Main Modification
NE	Natural England
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
OAN	Objective Assessment of Housing Need
¶/para	paragraph
PPG	Planning Practice Guidance
REM	Regional Econometric Model
RUDP	City of Bradford Replacement Unitary Development Plan
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SADPD	Site Allocations Development Plan Document
SAMM	Strategic Access Management & Monitoring Strategy
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SEA	Strategic Environmental Assessment
SEP	Strategic Economic Plan
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIDP	Strategic Infrastructure Delivery Plan
SOC	Statement of Co-operation
SOCG	Statement of Common Ground
SPA	Special Protection Area
SPMSPA	South Pennine Moors Special Protection Area
SSSI	Site of Special Scientific Interest
SUE	Sustainable Urban Extension
WYCA	West Yorkshire Combined Authority
YHRSS	Yorkshire & the Humber Regional Spatial Strategy
YHWTAB	Yorkshire & the Humber Waste Technical Advisory Body

Non-Technical Summary

This report concludes that the Local Plan for the Bradford District Core Strategy provides an appropriate basis for the planning of the district providing a number of main modifications are made to the plan. The City of Bradford MDC has specifically requested me to recommend any main modifications necessary to enable the plan to be adopted. All the main modifications to address this were proposed by the Council, and I have recommended their inclusion after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amend the approach and policy for protecting the integrity of the South Pennine Moors SAC/SPA and their zones of influence in Policy SC8, the associated Sub-area, Environment, Waste and Implementation policies and accompanying text, to reflect the updated Habitats Regulations Assessment;
- Amend the Settlement Hierarchy to designate Burley-in-Wharfedale and Menston as Local Growth Centres, to reflect the updated Habitats Regulations Assessment, and clarify the nature of development for each level of the hierarchy;
- Specify the “exceptional circumstances” identified to justify the amendment of Green Belt boundaries;
- Amend the spatial distribution of new housing development, to reflect the updated Habitats Regulations Assessment, the latest assessment of potential housing land availability and impact on heritage assets, including the revised apportionments for the City of Bradford Regional City (including Shipley & Canal Road Corridor, Shipley and North-East Bradford), Airedale (including Silsden & Baildon), Wharfedale (including Ilkley, Burley-in-Wharfedale & Menston), and the South Pennine towns and villages (including Haworth);
- Clarify and update the sub-area policies and detailed development strategy for each of the sub-areas of Bradford district, including the revised settlement hierarchy and spatial distribution of development, updated Habitats Regulations Assessment, and the scale and type of development at the settlements;
- Amend the number of new jobs envisaged to 1,600/year, to align with the housing strategy, clarify the justification for the overall amount of new employment land and confirm that this is a minimum figure, and clarify the purpose of the Economic Growth Areas;
- Clarify the approach to establishing the objective assessment of housing need, the overall housing requirement figure and the approach to 5-year housing land supply, and update the housing trajectory;
- Clarify the approach to phasing housing development, the release of housing sites, density, viability and housing standards;
- Amend the site size thresholds for affordable housing, specifying a minimum threshold of 11 units in Wharfedale and other specified villages;
- Update the approach and requirement for gypsies and travellers accommodation;
- Set out the approach and policy for development affecting Sites of Special Scientific Interest, and clarify the approach to Locally Designated Sites;
- Update and clarify the policy and approach to renewable energy;
- Update and clarify the policies and approach to flood risk and air quality;
- Re-draft the section and policies on Minerals, to provide more information about the supply and provision of minerals, including the Local Aggregates Assessment and landbanks;
- Re-draft the section and policies on Waste Management, to provide more information about existing and forecast waste arisings and existing and future waste management capacity, including the approach to identifying waste management sites and the area of search;
- Update and amend the content of the appendices, including monitoring, parking standards, amended housing trajectory, the approach to previously developed land and the programme for subsequent Development Plan Documents.

Introduction

1. This report contains my assessment of the *Local Plan for the Bradford District Core Strategy Development Plan Document* (BCS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan complies with the legal requirements, including the Duty to Co-operate, recognising that there is no scope to remedy any failure of the latter requirement. It then considers whether the Plan is sound in terms of the National Planning Policy Framework (NPPF), which confirms that to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy (NPPF; ¶ 182).
2. The starting point for the Examination is the assumption that the City of Bradford Metropolitan District Council (CBMDC) has submitted what it considers to be a sound plan. The basis for the examination is the *Local Plan for Bradford District Core Strategy Publication Draft* (February 2014) [SD/001].
3. This report deals with the Main Modifications needed to make the BCS sound and legally compliant, as identified in bold in the report **[MM]**. In accordance with section 20(7C) of the 2004 Act, CBMDC has requested me to recommend any modifications needed to rectify matters that make the plan unsound or not legally compliant, and thus incapable of being adopted. These Main Modifications are set out in the accompanying Appendix. CBMDC also proposes to make other minor changes (“Additional Modifications”) to the Plan, which do not affect its overall soundness and do not need any positive recommendation from me.
4. The Main Modifications that are needed to ensure the BCS is sound and legally compliant all relate to matters that were discussed at the examination hearings. All the Main Modifications were subject to sustainability appraisal and public consultation between November 2015-January 2016, and I have taken account of the representations and the subsequent hearings in coming to my conclusions.
5. My approach to the Examination has been to work with CBMDC and other participants in a positive, pragmatic and supportive manner. In so doing, I have considered all the points made in the representations, statements and at the hearing sessions. However, the purpose of this report is to consider the legal compliance and soundness of the Plan, giving reasons for the recommended modifications, rather than responding to every point made in the representations and discussions. References to documentary sources are provided thus [].

Assessment of Legal Compliance

6. At the hearing sessions of the Examination, some participants expressed concerns about the consultation undertaken during the preparation of the BCS, particularly the relationship with the proposed Holme Wood Sustainable Urban Extension (SUE) and possible alternative options, and the emerging Holme Wood & Tong Neighbourhood Development Plan (HWTNDP). There may have been some confusion when consultation was undertaken on the BCS Further Engagement Draft (FED) and the HWTNDP, but CBMDC confirms that the consultation arrangements for the BCS were undertaken separately from that on the HWTNDP. Although each consultation process can inform other plans, I understand that, whilst it may be a material consideration, the HWTNDP is non-statutory, having been prepared prior to the Localism Act. CBMDC has set out the process of public consultation on the BCS [SD/009; SD/015], and I can see no legal or procedural flaws

in the process in terms of the procedures outlined in the Statement of Community Involvement (SCI) [SS/055] and the requirements of the Local Planning Regulations as far as Holme Wood is concerned.

7. Some participants raised serious concerns about the adequacy and legality of the submitted Habitats Regulations Assessment (HRA) [SD/021-022]. These concerns particularly related to the assessment of the impacts of the BCS on the South Pennine Moors Special Protection Area (SPMSPA) and the implications of its conclusions for the status and potential for growth of settlements in Wharfedale (including Burley-in-Wharfedale and Menston), addressed in Policies HO3 & SC8 [PS/D025; PS/F009; PS/F024; PS/F027a; PS/F042d; PS/F050-51; PS/F082; PS/F086a/c]. The key issues concerned the conservation objectives of the SPMSPA, the extent of the functional habitat, including qualifying features and breeding bird assemblage, the recreational impact of development, location and choice of housing sites, and the wording of Policies SC8 & EN2. CBMDC confirmed that the approach had been agreed with Natural England (NE), but recognised that there were outstanding issues about mitigation, management measures and greenspace.
8. Consequently, I asked for these issues to be discussed between the parties during the hearing sessions of the examination with the aim of resolving the matters in dispute. The outcome was that CBMDC agreed to undertake a revised and updated HRA [PS/G004h], which forms the basis for the amended policies, including a revised settlement hierarchy and spatial distribution of development, particularly in the Wharfedale sub-area. CBMDC put forward proposed modifications to the relevant policies which overcome many of the concerns and have been endorsed by NE. The amended policies, including the revised distribution of development and status of particular settlements, were subject to consultation as part of the Main Modifications process, and I deal with the soundness implications of these proposed modifications later in my report.
9. Some concerns were also raised about the adequacy of the Sustainability Appraisal (SA) undertaken for the BCS, but SA was undertaken at all key stages during its preparation and earlier SA work influenced the final plan. The Final SA [SD/002-003] considered reasonable alternatives, including spatial, policy and site options, and identified the necessary mitigation measures. The BCS sets out the policy links to the SA and other key documents, and issues about the assessment of alternative/higher levels of housing development are dealt with in the soundness section of my report. Consequently, I find that adequate SA work has been undertaken to support the submitted BCS.
10. Issues about consistency of the BCS with the NPPF are dealt with in the soundness section of this report. CBMDC has also set out clear reasons why it is continuing with a multi-stage approach to its development plan, involving a Core Strategy, Site Allocations Plan, Area Action Plans and Waste Management DPD, rather than a single comprehensive Local Plan [SD/001; ¶ 1.3].
11. CBMDC has undertaken its own self-assessment of the legal compliance of the BCS [SD/007]. My assessment of these and other aspects of legal compliance of the BCS is summarised below, and confirms that it meets all the relevant legal requirements.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The BCS is identified in the approved LDS (July 2014) [SS/054], and its role and content comply with the LDS. It is also consistent with the current timetable of plan preparation, although formal adoption will be delayed due to the need to prepare and consult on Main Modifications needed to the BCS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2008 [SS/055]. The BCS was subject to several rounds of consultation and engagement during its preparation, in line with the adopted SCI and relevant legal and regulatory framework. The plan-making and consultation processes met the minimum requirements of the Local Planning Regulations and CBMDC’s adopted SCI, including consultation on Main Modifications.
Sustainability Appraisal (SA)	Adequate SA has been carried out at all stages during the preparation of the BCS, including at the Publication Draft and Main Modifications stages [SD/002-003; PS/G004c]. The Publication Draft was supported by a full SA, which also considered reasonable alternatives, including spatial options, and a SA Addendum was prepared at the Main Modifications stage; the BCS sets out all the policy links with the SA.
Habitats Regulations Assessment (HRA)	The original Habitats Regulations Assessment accompanying the submitted BCS [SD/021-022] was found to have legal and other flaws, but these have been rectified as part of the revised HRA [PS/G004h], which has also been undertaken to the satisfaction of Natural England.
National Policy	The BCS is consistent with national policy, except where indicated and Main Modifications are recommended.
2004 Act (as amended) and 2012 Regulations	The BCS complies with the Act and the Local Planning Regulations.

Assessment of Duty to Co-operate

12. Section 20(5)(c) of the 2004 Act requires me to consider whether CBMDC has complied with any duty imposed on it by s33A of the Act in relation to preparing the Plan. This requires them to co-operate in maximising the effectiveness of plan-making, and to engage constructively, actively and on an on-going basis with neighbouring planning authorities and prescribed bodies when preparing development plan documents with regard to a strategic matter. This is defined as sustainable development or use of land which has or would have a significant impact on at least two planning areas, including sustainable development or use of land for strategic infrastructure. This Duty (DTC) is closely related to the requirements in the NPPF (¶ 156; 178-181), and the soundness tests which require plans to be positively prepared and effective (NPPF; ¶ 182).
13. CBMDC has submitted evidence outlining how it has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies during the preparation of the BCS [SD/006; PS/E001]. This has involved co-operating and engaging with neighbouring authorities, established groups and partnerships in the Leeds City Region (LCR) to address strategic planning alignment and to support other local planning authorities in discharging the DTC.

14. There is a long legacy of strategic co-operation and joint working within the LCR and across West Yorkshire for both officers and elected members; this helps to co-ordinate strategic planning across the county, both from the earlier days of the Regional Spatial Strategy and as set up more recently by the LCR. I particularly note that all neighbouring authorities are satisfied that CBMDC has met the DTC requirements and there are no outstanding or unresolved issues; they have also endorsed CBMDC’s DTC statement [SD/006]. CBMDC has also engaged and consulted with prescribed bodies and the LCR Local Enterprise Partnership (LEP).
15. As part of the DTC process, CBMDC has identified and addressed strategic issues relating to housing requirements, economic issues and employment land, Green Belt, highways, transport and infrastructure, gypsies and travellers, environment, and minerals and waste matters; this culminated in the LCR Statement of Co-operation (SOC) [SD/006; Appx 2/4], agreed by all authorities in the LCR.
16. On housing, following the revocation of the Yorkshire & the Humber Regional Spatial Strategy (YHRSS), the LCR authorities have undertaken much work on establishing sub-regional housing requirements. CBMDC’s assessment of its own housing requirements was closely associated with this work, including examining relevant housing market signals, market drivers and characteristics of the housing markets across Bradford and beyond, including migration and cross-boundary issues. Furthermore, CBMDC is planning to fully meet its objectively assessed housing needs within its own area and there are no unmet housing needs from any neighbouring authorities which CBMDC is being asked to meet. More recent LCR reports addressing sub-regional housing needs and cross-boundary issues support the approach taken in the BCS. CBMDC has identified key strategic issues relating to the scale of housing provision and the location of new housing land, including impact on the Green Belt; detailed issues about the housing market area and past housing supply are dealt with in the soundness section of my report.
17. CBMDC confirms that adjoining local authorities, including Leeds City Council (LCC), were fully consulted about the BCS and the proposed Holme Wood SUE, including both Green Belt and highways implications. LCC has raised some concerns about the impact of new housing development close to its borders, including that resulting from the Proposed Modifications, but is content for these issues to be considered again in more detail when specific sites have been identified in the SADPD & AAPs.
18. The BCS recognises the need to deliver economic development and regeneration within the wider context of LCR growth and ambitions, reflecting the labour market of a polycentric conurbation and alignment with the strategic priorities and objectives of the LEP and its Strategic Economic Plan (SEP) [PS/B001b(xv-xvii)]. As part of the DTC, the potential impact of new employment land in Bradford on the regeneration prospects in neighbouring areas has been identified as a key strategic issue, but no issues have been raised by LCR authorities about the economic and employment strategy of the BCS.
19. CBMDC has identified and addressed strategic issues relating to the Green Belt, re-stating the functions of the Green Belt, identifying the exceptional circumstances needed to amend the Green Belt and minimising the overall loss of Green Belt. This ensures a consistent approach to the Green Belt across the LCR sub-region when considering the implications of the scale and extent of proposed development on Green Belt in the LCR, and has been endorsed by the LCR authorities. Although the LCR authorities acknowledge the possible need for a full review of the Green Belt in the future, there is no current requirement for such a wide-ranging review.

CBMDC strongly maintains that such a review is unnecessary in Bradford, given its selective approach to Green Belt amendments in this district and the need to avoid prejudicing its strategic function. The BCS identifies the broad locations where amendments to the Green Belt may be needed, and the detailed boundaries of these amendments will be set out in the subsequent Site Allocations DPD (SADP).

20. On transport, engagement has involved cross-boundary issues, joint working with other local authorities, public transport bodies, Highways England/Highways Agency (HA/HE) and the highways authorities, strategic transport co-ordination with the LEP’s SEP and the West Yorkshire Combined Authority (WYCA). Joint working has taken place on transport models and in establishing a consistent approach to considering the impact of new development on strategic, local and cross-boundary road networks and key strategic transport corridors. The BCS addresses the objectives of the West Yorkshire Local Transport Plan (WYLTP) [PS/B001b(xxiv)] and the LCR Transport Strategy [PS/B001b(xxii)], and further work will be undertaken, working with adjoining authorities, to address the detailed traffic and transport implications of particular developments. Major cross-boundary routes, such as the M62, M621, M606 & A65, have been examined, earlier highways objections have been overcome, and further on-going joint working will undertake and share information on particular transport corridors. CBMDC has also positively engaged with prescribed and other bodies in identifying the key elements of infrastructure needed to deliver the BCS, culminating in a Local Infrastructure Plan (LIP) [EB/044; PS/M005].
21. In order to be consistent with other LCR authorities, CBMDC commissioned an update of the gypsy and traveller accommodation needs included in the 2008 Gypsy & Traveller Accommodation Assessment (GTAA) for West Yorkshire [PS/G004f-g]. The approach was discussed with other local authorities, but since the final results of this work were not available prior to submitting the BCS for examination, the amendments to site/pitch provision in Policy HO12 were subject to consultation as part of the Main Modifications process.
22. Strategic issues on the environment, including flood risk and HRA, have been discussed with neighbouring authorities and prescribed bodies, including Historic England/English Heritage (HE/EH), Natural England (NE) and the Environment Agency (EA). A revised sequential testing for flood risk has been produced, agreed with EA, along with some updating of the Stage 1 Strategic Flood Risk Assessment (SFRA); the potential for proposed developments to increase flood risk downstream has also been examined. CBMDC has worked with NE to produce the submitted and amended HRA, including identifying and delivering management and mitigation measures and ensuring a consistent approach to considering the impact of development on the South Pennine Moors SPA and on internationally protected sites outside Bradford. CBMDC has also worked with HE/EH on heritage assets, and with other LCR authorities to establish a consistent approach to renewable energy technologies, including wind energy, and green infrastructure.
23. On minerals, strategic issues and requirements have been identified and addressed, in liaison with LCR mineral planning authorities and the Regional Aggregates Working Party, including the cross-boundary implications of supply and import/export of aggregates and cut stone; the results and implications of the latest regional Local Aggregates Assessment have been subject to consultation as part of the Main Modifications process. CBMDC has also identified and addressed strategic issues and requirements relating to waste management, engaging with other waste planning authorities and the Yorkshire & Humber Waste Technical Advisory Body (YHWTAB), including assessing regional landfill capacity and cross-

boundary movements of waste into and out of Bradford; a Memorandum of Understanding (MOU) and Waste Position Statement has also been agreed with the YHWTAB. Updates of the base information about waste generation and capacity have been subject to consultation as part of the Main Modifications process.

24. Consequently, having considered all the evidence and discussions at the hearings, I conclude that CBMDC has met the legal requirements of the Duty to Co-operate in terms of maximising the effectiveness of the plan-making process and actively co-operating and engaging with relevant bodies on an ongoing basis.

Assessment of Soundness

Preamble

25. The BCS establishes the strategic planning framework for Bradford district up to 2030, setting out the development strategy and establishing the principles and policy framework to guide development in the future. It is a “high-level” strategic Core Strategy which sets the scene, with a vision for the future and a series of strategic core policies, followed by policies for the sub-areas of the district, including Bradford City, Airedale, Wharfedale and the South Pennine Towns and Villages; a Key Diagram/Spatial Vision Diagrams indicate broad locations for urban extensions and growth areas, including some Green Belt deletions. It then sets out a series of thematic policies, covering economy and jobs, transport and movement, housing, environment, minerals, waste management, design, implementation and delivery. It is accompanied by an extensive evidence base, including sustainability appraisals, supporting documents, background papers, technical reports and studies, along with further evidence/statements submitted to the examination. The BCS will be supplemented by a Site Allocations Plan (SADPD), Area Action Plans (AAPs) and a Waste Management DPD, to provide a comprehensive development plan for Bradford district, which will eventually supersede the Bradford Replacement Unitary Development Plan (2005) (RUDP).
26. Preparation of the BCS began in early 2005, developing Issues & Options (2007-2008), Preferred Option and a Further Engagement Draft (2011), culminating in the Publication Draft version of the plan (2014) [SD/015]. Early stages of the preparation of the BCS were influenced by the strategic context of the YHRSS, but this was formally revoked in 2013. However, the BCS is supported and justified by its own locally-derived evidence which does not rely on previous evidence or strategies in the YHRSS. This includes detailed assessments of housing need, employment land, viability, accommodation for gypsies and travellers, transport, highways and infrastructure. The DTC process has partly replaced the former mechanisms of regional planning, effectively addressing cross-boundary issues. There has also been close liaison between CBMDC, the LEP and neighbouring local authorities in the Leeds City Region (LCR) to ensure consistency of approach and in addressing cross-boundary issues.
27. In considering the soundness of this plan, I have not only had regard to the NPPF & Planning Practice Guidance (PPG), but also taken account of more recent Government and Ministerial statements about planning and plan-making, including amendments to the PPG, to which CBMDC has responded.

Main Issues

28. Taking account of the representations, supporting evidence, written statements and discussion at the examination hearings, there are seven main matters and eleven key issues upon which the soundness of the BCS depends.

MATTER 1: SPATIAL VISION AND STRATEGIC OBJECTIVES

Key issue – *Is the Spatial Vision for Bradford justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the Plan, and are the Strategic Objectives appropriate, effective, justified and soundly based, and will they help to deliver the spatial vision of the Plan?*

29. Section 3 of the BCS sets out a Spatial Vision for the future of Bradford district, along with a series of Strategic Objectives to provide a tangible and measurable way of delivering the Vision [PS/E002]. The Vision is supplemented by a series of place-specific spatial visions and policies for each sub-area.
30. The Vision derives from the challenges, issues, opportunities and aspirations of the Community Strategy [PS/B001b(i)], and gives spatial expression to this strategy. It provides a positive approach to the sustainable development of homes, economic growth and associated infrastructure, which has been informed by the local community through consultation, engagement and the evidence base. It also recognises the environmental, cultural and historic value of much of the district. Together with the place-specific visions for the sub-areas which highlight the importance of urban regeneration and use of brownfield land, it is a key starting point to establish a clear, concise, effective and locally distinctive spatial vision for the district. As such, it forms a sound basis for the strategic policies of the BCS, and provides an appropriate balance between economic growth, sustainable development, infrastructure requirements, environmental and social matters, and between brownfield and greenfield development.
31. Some participants expressed concern about the time-period of the BCS. When submitted, it covered a period of at least 15 years, but delays in the examination and adoption period would slightly reduce this period; however, the NPPF allows CBMDC to determine the appropriate plan period. Given the relatively long gestation period of this plan and CBMDC’s clear intention to review it well within this period, this is not a fundamental failing of the BCS. Issues about the vision and strategy for particular places, including Bradford City, Holme Wood, Airedale and Wharfedale, are dealt with in the sub-areas section of my report.
32. The Objectives cover the key strategic matters relevant to the delivery of the Spatial Vision, including cross-boundary issues, with specific linkages shown to corporate and LCR priorities; they directly relate to the Spatial Vision and reflect the challenges, issues, opportunities and aspirations of the Community Strategy. In Strategic Objective 2, CBMDC suggests confirming that housing, business and commercial needs are to be met *in full*; this is necessary to provide a firm and unequivocal statement of the intentions of this objective, making it effective, sound and consistent with the NPPF [MM1].
33. With this recommended change, the Spatial Vision and Strategic Objectives are locally distinctive and appropriate for Bradford district, reflecting the priorities of the Community Strategy and the views of local communities, and provide a sound and effective strategic framework for the plan’s strategy and strategic policies.

MATTER 2 – STRATEGIC CORE POLICIES

Key issue – Are the Overall Approach and Key Spatial Priorities, the principles of locating development, the general approach to the Green Belt, and the approach to development proposals in the South Pennine Moors Zone of Influence soundly based, effective, appropriate, deliverable, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and are they positively prepared and consistent with the latest national policy?

34. Section 3 of the BCS also sets out key strategic core policies, including the overall approach and spatial priorities, settlement hierarchy, principles of locating development, Green Belt and protection of the South Pennine Moors. Issues relating to the settlement hierarchy are dealt with under Matter 5, and other strategic core policies are dealt with under the relevant topics, later in this report.

Overall approach and Key Spatial Priorities

35. Core Policy SC1 summarises the aims of the BCS and establishes the key spatial priorities to deliver the spatial vision and objectives of the Plan and capitalise on the main strategic strengths and issues across the district. It is a high-level core policy, which provides the strategic framework for the more detailed policies which follow. It establishes spatial priorities which reflect CBMDC’s key priorities, including regeneration, the need for a balanced distribution of development and infrastructure, as well as the nature of the settlements within the district and their roles, challenges and opportunities. It also recognises the important role that the district plays in the wider LCR and the priorities of the LEP’s SEP, along with the environmental and heritage assets of the district, the need for significant growth and the challenges in mitigating and managing the impact of climate change. It reflects the core principles in the NPPF (¶ 17), providing a balanced approach between the three dimensions of sustainable development, and is supported by further evidence which justifies its approach [SD/015; EB/038; EB/044; PS/E003].
36. Some participants were concerned that the policy over-emphasises the role of Bradford as the Regional City, but this is critical to the strategy in terms of regeneration and land supply; along with Shipley and Lower Baildon, it accounts for over 65% of the proposed new development in the district, whilst recognising that sustainable development is also proposed in other parts of the district. Issues relating to the *Economic Growth Areas* are dealt with under Policy EC1, and other policies deal with the status of particular settlements and concerns about infrastructure, related to the Local Infrastructure Plan [EB/044; PS/M005]. However, amendments to the policy and accompanying text are needed to reflect changes in the settlement hierarchy (covered under Policy SC4), to remove the impression that only housing to meet local needs is being provided for, and clarify the definition of *key hubs* in criterion B5 of the policy [MM2-4]. With these recommended amendments, the policy would be clear, effective and sound.

Principles for the location of development

37. Core Policy SC5 establishes the four main priorities guiding the location of development, with a sequential approach balancing the priorities of brownfield and greenfield land, local Green Belt releases and larger-scale urban extensions, as well as the accessibility, deliverability and viability of new development. It is a high-level strategic policy which gives direction to the BCS and the site-selection/allocation process, helping to deliver its vision and objectives through sustainable development; it also focuses on the main urban areas, but recognises the need for some loss of Green Belt. More detail is provided in Policies HO6 & HO7. The

spatial distribution of development is set out in detail in Policy HO3 and the associated sub-area Policies WD1, AD1, WD1 & PN1, which I deal with later.

38. The main concerns relate to the emphasis given to previously developed land (PDL) and the approach to the Green Belt. However, the prioritisation of developing PDL is entirely consistent with current policy in the NPPF (¶ 17), and with more recent ministerial statements and emerging policy, and is supported by evidence in the SHLAA [EB/049]. CBMDC accepts that greenfield sites will need to be developed, including some Green Belt land, but rightly maintains that the starting point should be to use developable and deliverable PDL, since it could offer benefits in terms of regenerating and improving an area, as well as reducing the need to use green spaces and greenfield sites. Greenfield sites are next in the sequence, reflecting national policy in the NPPF, which advises that non-Green Belt options should be looked at first in terms of meeting assessed development needs. This enables sites to be identified and compared during the site-selection process. Further flexibility is provided by excluding any contribution from windfall sites which may come forward during the plan period.
39. Issues about viability have been considered in the Viability Assessments [EB/045-046], which recognise the challenges which may be faced in the inner urban areas of Bradford city and Keighley, but the policy does not place undue emphasis on these types of sites. Policy SC5 also refers to accessibility, but the standards in Appendix 3 are a starting point, and are considered in more detail in Policies TR3 & TR5; infrastructure requirements are addressed in the Local Infrastructure Plan (LIP) [EB/044; PS/M005]. Consequently, the general approach of the policy, including the balance between brownfield and greenfield sites, is appropriate and justified.
40. However, amendments to the policy and accompanying text are needed to confirm that it only applies to the allocation of sites in subsequent plans, without preventing windfall developments in sustainable locations from coming forward, and to clarify the approach to the accessibility standards (in Appendix 3) **[MM13-14]**. With these recommended amendments, Policy SC5 would be clear, effective and soundly based.

Green Belt

41. Core Policy SC7 sets out the approach to the Green Belt, reaffirming its role and confirming that some releases of land from the Green Belt will be needed, but indicating that the revised Green Belt boundary should endure for at least 15 years from adoption of the BCS. The NPPF (¶ 83-84) confirms that existing Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan, taking account of the need to promote sustainable patterns of development. The main issue is whether the approach of Policy SC7 is appropriate, effective, positively prepared, justified, soundly based and consistent with national policy, particularly in terms of identifying the exceptional circumstances needed to justify using Green Belt land and demonstrating the need to promote sustainable patterns of development.
42. CBMDC has identified the exceptional circumstances needed to justify the release of Green Belt land, in order to fully meet the development needs for housing and to support the regeneration and long-term economic success of the district [SD/16; PS/E003; PS/F067/086b]. Evidence in the SHLAA [EB/049; PS/G004i] confirms that insufficient land can be identified outside of the Green Belt to fully meet identified housing needs; some 11,000 dwellings are likely to have to be accommodated on Green Belt land, given the availability and constraints on non-Green Belt land.

43. Further evidence in the Growth Study [EB/037] confirms that land is available in the Green Belt in sustainable locations without undermining the functions and purpose of the Green Belt. Similarly, the Employment Land Review (ELR) [EB/027] confirms that a significant proportion of new employment land will have to be accommodated within Green Belt areas, to ensure a suitable offer of deliverable large sites in good market locations, given the current supply and quality of employment land in non-Green Belt areas.
44. These exceptional circumstances are closely related to meeting all identified development needs, promoting economic development and regeneration, and ensuring sustainable patterns of development. However, these specific circumstances are not explicitly set out in the submitted BCS, and so modifications are needed to the policy and accompanying text to confirm the exceptional circumstances needed to justify the use of Green Belt land and to meet the requirements of national policy **[MM17-18]**.
45. Policy SC7 confirms that a selective review of the Green Belt will be undertaken in the subsequent SADPD, in order to fully meet identified housing and other development needs; this detailed review will be undertaken within the strategic framework provided by the BCS, focusing on the broad areas where release of Green Belt land is needed, informed by published methodology and aligned to approaches adopted by neighbouring authorities, as confirmed in the DTC statement [SD/006]. The extent of the Green Belt around Bradford is well established and, although the RUDP reviewed the entire Green Belt in Bradford, in most cases it is drawn tightly around the urban areas. Moreover, a staged approach to assessing and reviewing Green Belt boundaries in separate parts of the local plan has been found sound in other cases and in legal judgements¹.
46. Some participants argued that a full review of the Green Belt is needed; indeed, some suggested a wider review of the sub-regional Green Belt undertaken in collaboration with neighbouring authorities. However, given the underlying strategy of the BCS, with its focus on specific areas, and in view of the different stages that adjoining local plans are at, this is neither practicable nor necessary. CBMDC and the LCR authorities accept that a strategic review of the wider Green Belt may be needed in the future, but there is currently no commitment to such a review, and neighbouring authorities are content with CBMDC’s approach [SD/006].
47. Moreover, the Growth Study [EB/037] provided a high-level review of land around the settlements in Bradford, including the functions of the Green Belt, and provided the strategic context for identifying potential broad locations for new development in the Green Belt. It also confirmed that, while Green Belt land releases will be needed at most settlements in the district, the release of such land will be minimised, supported by Policies HO5 & HO7; the detailed location, extent and implications of releasing such land will be considered in the SADPD. The sub-area policies indicate the implications of Green Belt release for each settlement, which are addressed later in my report. Moreover, since Green Belt boundaries are expected to endure beyond the current plan period, there is no absolute requirement to identify further Safeguarded Land, particularly since this matter can be reconsidered if and when the wider sub-regional Green Belt is reviewed. In these circumstances, the approach is appropriate for Bradford and accords with national policy in the NPPF (¶ 82-85).

¹ for example: Calverton PC and Nottingham CC, Broxtowe BC & Gedling BC and Peverill Securities Ltd & UKPP (Toton) Ltd [2015; EWHC 1078 (CO/4846/2014); 21/04/15]

48. Many participants were concerned about the extent and implications of Green Belt land releases in particular areas, including North-East and South-West Bradford, Holme Wood/Tong Valley, and settlements in Wharfedale. However, although the key diagrams indicate the broad location of such Green Belt releases, the precise location, extent and boundaries of such land will be addressed in the SADPD, as part of a detailed review and assessment of potential sites. A significant amount of Green Belt land will need to be released to accommodate identified housing and other development needs, but the detailed location, extent and implications of such releases cannot properly be considered at this stage in this high-level Core Strategy; this is a matter to be addressed in the subsequent SADPD.
49. Consequently, and with the recommended modifications to explicitly set out the exceptional circumstances justifying the use of Green Belt land **[MM17-18]**, the approach of Policy SC7 is appropriate, effective, positively prepared, justified, soundly based and consistent with national policy.

South Pennine Moors

50. Core Policy SC8 sets out the approach to new development in terms of protecting the South Pennine Moors SAC/SPA and its Zones of Influence. The main issue is whether this approach is appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy and good practice.
51. The approach in the submitted Plan is based on the original Habitats Regulations Assessment (HRA) [SD/021]. However, serious concerns were raised by some participants about the approach, content and legal compliance of this HRA, particularly in terms of the conservation objectives of the South Pennine Moors SAC/SPA, the extent of the functional habitat, including the qualifying features, breeding assemblage and foraging areas for birds, the recreational impact of development, and its implications for the location and choice of housing sites, particularly in Wharfedale. Having reviewed the approach and content of the original HRA, the supporting material and evidence, I consider it had serious deficiencies, both in legal and content terms, and was unsatisfactory.
52. Consequently, CBMDC’s consultants reviewed and revised the original HRA work, in liaison with Natural England (NE). NE has agreed with the assessment approach and conclusions of the revised HRA, subject to all the necessary mitigation measures being developed and secured, and the revised approach has largely met the main concerns of representors. Amendments to the wording of Policy SC8 were publicised as part of the Main Modifications procedure and were discussed at the resumed hearings. CBMDC has also provided further evidence to explain and justify its revised approach [PS/K001].
53. The revised policy sets out the approach to development within three identified zones, confirming that development will not be permitted where it would be likely to lead to an adverse effect, which cannot be effectively mitigated, on the integrity of the SAC/SPA; it also sets out the approach to carrying out the assessment for each of the zones, with further guidance in the accompanying text. This revised approach takes a slightly less precautionary approach, and acknowledges that some adverse effects are capable of mitigation, reflecting the detailed technical work undertaken in the revised HRA. Although some participants criticise the approach and methodology, it is consistent with national policy in the NPPF (¶ 119), good practice guidance in the PPG [ID-8-011] and the

relevant regulations², and with the SA addendum [PS/G004c]. More detailed guidance will be provided in a subsequent SPD and the associated Strategic Access Management & Monitoring Strategy (SAMM). Although the local plans for neighbouring authorities are at different stages of preparation, the approach to development affecting the South Pennine Moors SPA within Bradford district is not inconsistent or incompatible with the approach of neighbouring areas.

54. On this basis, the revised policy provides a consistent, effective and proportionate approach to the potential impact of development on the South Pennine Moors SAC/SPA, which is appropriate to the strategic nature of this Plan; further more detailed assessments will be undertaken in the subsequent SADPD and for individual planning applications. There are some outstanding concerns about the detailed wording of some of the accompanying text and associated policies, including Policies EN2, AD1, WD1, PN1 & WM2; CBMDC has agreed some further minor changes to the wording, which have been endorsed by NE and, as the responsible body, it is this wording that is to be preferred; when read as a whole and in the context of the conclusions of the updated Habitats Regulations Assessment, the approach is clear, consistent and sound.
55. Consequently, with the recommended changes **[MM19-37]**, the revised approach to development affecting the integrity of the South Pennine Moors SAC/SPA is appropriate, effective and proportionate, without being unduly precautionary, and is justified, soundly based and consistent with national policy and good practice.

Flexibility and strategic guidance

56. The Plan and its policies include sufficient flexibility to take account of unexpected circumstances, including achieving a significant boost in housing supply, compared with past completions, by setting a minimum "at least" overall requirement. This would provide flexibility to enable other sustainable developments to come forward, including windfall sites and future proposals in neighbourhood plans, ensuring that housing supply is robust and meets identified needs. Further flexibility is provided within specific policies, including those that address viability, other contingencies and site-specific circumstances. As an integral part of the monitoring process, specific indicators show where remedial action is needed to ensure that the plan’s delivery targets are being met.
57. When the strategic core policies are read in the context of the detailed thematic policies which follow, they provide sufficient strategic guidance to direct future development and inform development decisions, by specifying the scale, location, timing and implementation of new strategic developments, as well as providing the policy framework for progressing developments and making development decisions. The Key Diagram and other sub-area diagrams specify the spatial elements of policies and proposals, including the key locations for the main housing and economic growth areas (including the urban extension at Holme Wood), potential localised Green Belt deletions, areas for regeneration and renewal, the settlement hierarchy and strategic transport network.

Alternative strategies and options

58. In order to establish the most appropriate strategy, it is necessary to consider alternative options in terms of the spatial distribution and scale of development. At the Issues & Options stage, CBMDC initially considered three strategic options based on regeneration, dispersal and focused growth; at the Further Issues &

² Conservation of Habitats & Species Regulations 2010 (Reg 102)

Options stage, four further options based on the YHRSS settlement hierarchy, continuation of the RUDP, focused and dispersed growth points, with a fifth option including an element of dispersal to non-city locations, were considered, all of which were subject to SA. Early options looked at different levels of development at the various settlements, including alternative locations and spatial distributions of development, but most of these options were set in the context of the YHRSS, including a higher housing figure of 50,000 dwellings; this would more than meet the objectively assessed housing needs of the district.

59. More recently, a wide range of options based on various housing and employment-led scenarios were examined in the Housing Requirement Studies [EB/028-033; PS/F017]. Various areas of search were examined for larger-scale developments, including Green Belt areas, and more detailed site options will be considered in subsequent SADPD & AAPs. This is a reasonable approach to take, given that this is a strategic plan and there is no need to meet any of the development needs of surrounding areas and no other authority proposes any peripheral development which might help to meet Bradford’s needs.
60. It is for CBMDC to determine which alternative strategies should be considered as part of the SA process and, on this basis, the approach set out is sound. PPG guidance [ID:11] does not require a specific set of alternatives to be considered at every stage of the process, providing reasons are given for selecting and rejecting particular alternatives. Having considered all the evidence, I am satisfied that CBMDC has considered reasonable and realistic alternative strategies, scenarios and options at various stages throughout the preparation of the BCS, with a full assessment of their advantages and disadvantages and reasons for rejecting and selecting particular alternatives in the associated SA reports.
61. Consequently, with the recommended amendments [**MM2-4; 13-14; 17-37**], the strategic core policies provide an appropriate, effective, deliverable, locally distinct and soundly based strategic framework for the BCS, which is justified with robust, proportionate and credible evidence, and which is positively prepared and consistent with national policy.

MATTER 3 – HOUSING

Housing requirement

Key issue – Has the Council undertaken its objective assessment of housing need in line with the latest national guidance and good practice?

62. In order to significantly boost housing supply, the NPPF requires plans to fully meet the objectively assessed need for market and affordable housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF’s policies as a whole, including specific constraint policies. It confirms that a Strategic Housing Market Assessment (SHMA) should assess the full housing need, working with neighbouring authorities where housing markets cross administrative boundaries. The scale and mix of housing should meet household and population projections, taking account of migration and demographic change, address the need for all types of housing, including affordable housing, and cater for housing demand. PPG [ID-2a] confirms that DCLG’s household projections are the starting point for assessing overall housing need; these can be adjusted to reflect local circumstances, such as demography, migration and household formation. Housing factors, including market signals, and economic factors, including economic projections and the likely change in the number of jobs, should also be taken into account.

63. The assessment of housing need requires assumptions and judgements to be made about various trends, based on a variety of empirical evidence, for which there is no single method, approach or data which determines the appropriate level of housing need; it is a matter of judgement based on an objective analysis of the available evidence, rather than on a forensic examination of each figure, estimate and assumption.
64. Policy HO1 sets an overall housing requirement of 56,140 homes (2004-2030); after allowing for completions between 2004-2013 and a reduction in vacant homes, it makes provision to allocate land for at least 42,100 homes between 2013-2030. This figure is based on CBMDC’s Housing Requirements Study (HRS) [EB/028-033] and SHMAs [EB/050-053], which establish an annual requirement of 2,200 homes (2011-2030); this includes an allowance of 7,687 dwellings to reflect past under-provision against the development plan targets for 2004-2011 and the shortfall against the proposed 2,200 housing target for 2011-2013, as well as an expected reduction of 3,000 dwellings from bringing vacant homes back into use [PS/E004a]. It also takes into account the relatively high need for affordable housing in the district (587 units/year).
65. CBMDC commissioned independent consultants to undertake the necessary work and has submitted detailed evidence and justification for its assessment of housing need [EB/028-033; EB/037; EB/050-053; SD/015-017; PS/F002, F017, F059, F063, F086f-i]. The latest update of housing requirements [EB/033; PS/E013-015] was commissioned as a result of work with neighbouring authorities, to ensure a consistent approach to addressing housing needs in the LCR. It is particularly relevant to note that neighbouring authorities do not dispute the proposed housing requirement figure, and none seek Bradford to meet any of their housing needs [SD/015]. The original HRS [EB/033] examined several core scenarios, based on various demographic and employment-led scenarios, whilst a more recent analysis includes updated and alternative demographic and employment-led trend-based scenarios incorporating migration data [PS/F002].
66. In general terms, CBMDC’s approach to establishing the objective assessment of housing need is consistent with the NPPF and PPG guidance, although it uses the term “housing requirement” as a proxy for “housing need”. As a starting point, the updated HRS uses what were, when the plan was prepared, the latest 2011-based household projections and 2012-based population projections, which establish a base demographic need for some 1,785 dw/year, increasing to 2,049-2,302 dw/yr for the employment-led and migration scenarios; the proposed requirement figure of 2,200 dw/yr is towards the upper end of the various scenarios. The HRS examined alternative headship rates, based on the 2008 & 2011-based household projections, and took account of national and international migration rates, including local adjustments to reflect higher levels of international migration in Bradford district [PS/F086f]. There may be some uncertainty about some of the projections and assumptions, but they are based on the most reliable published forecasts. The housing requirement figure is based on a reasonable balance between the various trend-based projections, reflecting likely household formation trends, local circumstances and economic needs and opportunities.
67. In terms of the housing market area, Bradford district is largely self-contained, with over 76% of moves made within the area, but with functional links with adjoining housing markets, including Leeds. The HRS and SHMA have considered other housing factors, including key drivers of population and housing growth, market demand and relevant market signals, the need for affordable housing and past housing provision and completion rates. The studies have thoroughly

analysed the housing market and addressed house sales and prices, transaction levels, affordability, vacancies, overcrowding, rates of development and the level of unmet housing need [PS/F059; F086i]. As regards past under-performance, CBMDC readily accepts that past completion rates and housing provision have fallen short of the required targets, and an allowance of 7,687 dwellings has been added to reflect this factor [PS/F086h]. The overall housing requirement figure represents a significant uplift in the demographic housing need, and takes into account past rates of growth and overcrowding.

68. The latest SHMA [EB/052] assesses the overall need for affordable housing within Bradford district, identifying a net need for some 587 affordable units/year, offsetting shortfalls and surpluses in dwelling stock. Future affordable housing need is already included in the demographic calculations and, given the overall housing requirement figure and the fact that most of the identified need for affordable housing will be met over the Plan period (see later), I can see little justification for a further uplift in the OAN to reflect this element of housing need. The studies have also reflected on the needs of different groups, including the elderly and disabled people.
69. The overall housing requirement figure also takes account of the expected reduction in vacant homes over the plan period. This reduction could be considered as part of the supply side of the equation, but CBMDC’s approach does not significantly affect the overall housing requirement figure. The anticipated reduction of 3,000 homes is supported by Policy HO10 and specific evidence [PS/B001b(x-xii)], recognising progress in delivering this objective by initiatives like the Empty Homes Strategy, in line with NPPF (¶ 51) and PPG guidance [ID-3-039].
70. The HRS also considered economic factors, not only in terms of the various employment-led scenarios, but also reflecting existing and future economic activity and economic growth rates, jobs growth, unemployment, commuting patterns and cross-boundary employment flows [SD/006]. The assumptions are clearly set out, including the basis for the economic models used. CBMDC recognises the apparent disparity between the aspirational number of jobs originally envisaged in Policy EC2 in the submitted Plan and the more realistic number of new jobs expected, based on future employment land supply (1,600 jobs/year). The latest HRS uses the most recent REM model, which indicates an annual increase of 1,604 jobs, equating to 28,867 jobs over the Plan period. As a result, the level of jobs growth in Policy EC2 has been amended to 1,600/year (see later), to ensure consistency between the housing and economic strategies. The housing projections are now fully aligned with the latest employment projections, recognising that both economic and housing markets are in an improving and recovering position. In considering economic factors, CBMDC also proposes a housing requirement figure which helps to support the priorities of the LEP’s SEP [PS/B001b(xv-xvii)].
71. Consequently, I am satisfied that the “housing requirement” figure of 2,200 dw/yr (2011-2030) fully meets the objectively assessed need for market and affordable housing over the Plan period. It more than meets demographic housing needs and addresses housing market signals and previous backlogs in housing provision, having regard to the growth in households since 2004 and housing completions. It takes account of the need for a significant boost in housing provision, compared with that envisaged in the previous RUDP (1,390 dw/year) and actual completions (721-1,000 dw/year). It also takes account of the proposed economic strategy and economic factors, including economic needs and opportunities. It includes two elements of uplift, reflecting past under-performance in housing completions and ensuring that the overall housing requirement aligns with economic and jobs

growth projections. Cross-boundary housing issues have been addressed, including the relationship with Leeds and the LCR. The housing requirement figure also reflects work undertaken at LCR level, which has emerged through a process of co-operation and co-ordination [SD/006], taking account of the housing and economic strategies, plans, priorities and projects of adjoining authorities, the LEP and other agencies. In bringing all the evidence together in establishing the overall housing requirement, CBMDC has also considered development, social, physical and policy constraints, including loss of Green Belt and infrastructure issues, along with likely delivery rates, viability and deliverability issues.

72. Several participants seek levels of housing provision both higher and lower than that proposed, some using differing assumptions and methodologies, including those relating to headship rates, market signals, economic activity rates, economic and jobs growth, whilst others use methodology which is inconsistent with the approach set out in the NPPF/PPG. Some highlight the fact that CBMDC is proposing to increase the level of housing provision above that needed to meet demographic trends, but this is only one element in the assessment of housing need. In the course of preparing the BCS, CBMDC has considered and assessed various alternative levels and spatial options of housing provision, including earlier options based on the former YHRSS and more recent alternatives based on the various scenarios included in the HRS [PS/F017]; allowances for windfalls, backlog and unmet need have also been considered [PS/F063; PS/F086g-h].
73. Some participants were particularly concerned about the potential impact on the Green Belt, some of which would be lost as a result of meeting the proposed level of housing required. The NPPF (¶ 14) confirms that Green Belt is one of the restrictive policies which may constrain the ability to fully meet objectively assessed needs. However, CBMDC has fully examined the impact of the proposed level of development on the Green Belt and has shown that a sustainable pattern of development can be provided by making significant, but limited and focused amendments to Green Belt boundaries, without fundamentally undermining the purposes and functions of the Green Belt, as allowed for in the NPPF (¶ 83-84). As I have found earlier in my report, the exceptional circumstances justifying the alteration of Green Belt boundaries have also been demonstrated.
74. The Strategic Housing Land Availability Assessment (SHLAA) [EB/049; PS/E018a-b; PS/G004i] confirms that maximum use will be made of brownfield and non-Green Belt land, whilst the Growth Study [EB/037] confirms that Green Belt releases can be made in a range of locations which are both sustainable and accessible, without undermining the local or strategic functions of the Green Belt; this assessment also considered housing land supply issues (see later). Issues of flood risk and drainage have been fully considered and CBMDC confirms that sites would be selected in non/low flood risk areas.
75. Consequently, and having reviewed all the evidence, I am satisfied that the proposed housing requirement figure will fully meet the objectively assessed need for market and affordable housing over the Plan period, and is soundly based, fully justified by proportionate and robust evidence, based on realistic assumptions, and is consistent with the approach advocated in the NPPF and PPG.
76. However, in order to fully explain, justify and update the process of establishing the overall housing requirement figure, some amendments are needed to the text accompanying Policy HO1 **[MM72-73]**. With these recommended amendments, the approach would be soundly based, fully justified, effective, positively prepared and consistent with the latest national policy and good practice guidance.

Housing supply

Key issue – Is the approach to identifying the strategic sources of housing supply fully justified with up-to-date and reliable evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance?

77. The need to make adequate provision to ensure a sufficient supply of housing land is a key requirement of national policy. The NPPF advises that local authorities should identify and update the supply of specific deliverable housing sites to meet 5 years’ housing requirement, along with a buffer of 5/20% (depending on whether there has been persistent under-delivery of housing), together with developable sites or broad locations for growth in years 6-10 and, where possible, years 11-15; the expected rate of housing delivery should be shown in a housing trajectory. A Strategic Housing Land Availability Assessment (SHLAA) should also be prepared to establish realistic assumptions about the availability, suitability and viability of land to meet the identified need for housing over the plan period.
78. Policy HO2 confirms that the housing requirement figure will be met by strategic sources of housing supply, including past housing completions, sites with existing commitments and planning permission, unimplemented sites allocated in the RUDP, and additional deliverable and developable housing sites to be allocated in the SADPD, the AAPs and Local Neighbourhood Plans. It identifies specific priority area-based initiatives for growth, including designated Growth Areas (Shipley & Canal Road Corridor; Bradford City Centre, SE Bradford and other smaller-scale growth settlements), an urban extension at Holme Wood and local Green Belt releases. Further evidence is provided to justify the main elements of the strategic sources of housing supply, including current commitments and new development sites in the main areas of strategic growth, along with the potential capacity of key locations within these areas [SD/16; EB/037; PS/E004b]. However, further clarification is needed about the status of housing completions in order for the policy to be effective **[MM74]**. The detailed distribution and capacity of specific settlements and locations is addressed under Policy HO3.
79. Specific evidence about potential land supply is provided in the SHLAAs [EB/049; PS/E018a-b; PS/G004i], the latest of which undertakes a comprehensive and robust assessment of the suitability, availability, developability, deliverability, viability, sustainability and constraints of potential sites, and has been discussed with developers, landowners and other stakeholders. It provides an extensive “pool” of potential sites from which site allocations can be selected, identifying potential sites for almost 51,000 dwellings within the plan period, including over 19,000 on Green Belt or safeguarded land; sites for about 25,600 are identified as suitable now without constraints, suggesting that additional sites for over 16,000 dwellings will need to be identified to fully meet the housing requirement figure (42,100) indicated in Policy HO1.
80. The latest SHLAA confirms that there is insufficient land identified as suitable and available now, without constraints, to fully meet the proposed housing requirement figure. However, progress is being made on identifying new site allocations through the emerging AAPs for Bradford City Centre and the Shipley & Canal Road Corridor, progressing work on the Holme Wood urban extension, and preparing the SADPD; other initiatives involving CBMDC’s land assets and other housing providers will also help to ensure that the identified housing needs are fully met within the Plan period. The SHLAA also identifies some sites which are not currently available and may be developed in the longer-term, beyond the current plan period (c.4,000 dwellings), but some could come forward earlier.

81. The SHLAA confirms that sufficient brownfield land can be identified to reflect the targets for each sub-area/settlement set out in Policy HO6, although a significant number of sites will inevitably need to be allocated on greenfield land, including some Green Belt sites [PS/F086m]. Although windfall sites have been an important element in past supply, the current figures make no allowance for such sites, given the smaller site size and more thorough assessment of potential sites in the SHLAAs; however, if such sites did come forward in the future, this would give further flexibility in terms of meeting identified housing needs [PS/F086g].
82. However, the latest SHLAA and other evidence [PS/E004a; PS/F033-34; PS/F086j-k; PS/G004i] confirms that a 5-year housing land supply cannot currently be demonstrated in Bradford district; the latest evidence indicates that deliverable supply for this period is barely 2.3-3.3 years supply, depending on whether the backlog is met within five years or over the entire plan period. Furthermore, CBMDC accepts that, due to under-delivery in the past, a 20% buffer needs to be added to the 5-year housing land requirement, as advised in NPPF (¶ 47). Nevertheless, as a result of the commitment to fully meet the identified housing requirement figure, the BCS will make a significant contribution to securing a 5-year supply of housing land by identifying specific locations for new housing development, which will be taken forward in the subsequent SADPD and AAPs in terms of making specific land allocations.
83. Addressing the current shortfall of housing provision (over 7,680 dwellings) is a critical issue, particularly in terms of the 20% buffer and whether it will be met within 5 years (as recommended in the NPPF/PPG), or over the entire plan period. CBMDC proposes to meet the shortfall (including the 20% buffer) over the period of the Plan, as confirmed in the revised housing trajectory and explanatory text **[MM152-154]**. To attempt to fully meet the shortfall and buffer within the first 5 years would imply an excessive amount of new housing to be completed within this period (over 4,000 dw/year); this would be both unrealistic and undeliverable, particularly when seen in the context of the previous and current rates of dwelling completions (around 700-900/year) and the environmental and infrastructure implications of such increased provision [PS/F063; PS/F086h]. The BCS already aims to increase annual house completions to at least 2,200 dwellings, which represents a significant increase over current and past performance; even meeting the shortfall with the 20% buffer over the remaining plan period will be challenging, compared with past and current rates of housing completions. Consequently, there are sound reasons to justify an approach which envisages meeting the shortfall in housing delivery over the full plan period, ensuring an aspirational, but realistic supply of housing land.
84. Further consideration of the timing and phasing of new housing development is addressed under Policy HO4. However, provided that the necessary site allocations are made and come forward as expected, the provisions of Policy HO2 will ensure that sufficient land is allocated to fully meet housing requirements both over the next 5-year period and for later periods of the plan. CBMDC is fully aware of the need to make new site allocations, including new areas of growth and Green Belt releases, and the BCS will provide the strategic framework and spatial direction for making the necessary site allocations in subsequent parts of the development plan. The suitability, availability, developability, deliverability and viability of particular site allocations will need to be carefully assessed when specific sites are identified in subsequent AAPs/SADPD.

85. Some participants suggested that a better strategic framework could be provided for the designated Growth Areas. However, considering all the policies in the BCS and the supporting evidence, sufficient information is available about potential sites and options for the Growth Areas, including the Growth Study [EB/037] and sub-area policies. Work is actively taking place in bringing forward site allocations in these areas, including site appraisals, development frameworks and masterplans, through work on the AAPs and SADP. Considerable evidence is available, much of it subject to consultation and debate, along with infrastructure requirements, which have been included in the Local Infrastructure Plan (LIP) [EB/044]. Further work will also be undertaken on the details of specific allocations, including the Holme Wood urban extension.
86. Although the delivery of some sites in the inner areas of Bradford City may prove challenging, particularly in terms of viability and market demand, CBMDC is actively working on identifying and bringing forward such sites, involving various public/private sector initiatives, funding and development partners. Moreover, whilst many brownfield sites have come forward in the past, it is clear that identified housing needs cannot be met from this source alone, and greenfield and Green Belt sites will need to be identified to fully meet these housing needs. The precise extent of Green Belt land releases will be known when specific allocations are made in subsequent parts of the Local Plan. The deliverability of some large sites, such as Holme Wood, may be challenging, especially where significant infrastructure is needed, but realistic build rates have been used and the likely timescale and delivery of specific sites is indicated in the latest housing trajectory and will be regularly monitored.
87. Having considered all the available evidence and the discussions at the hearing sessions, and with the recommended updates and clarification to the housing trajectory and accompanying text [MM74; 152-154], I consider Policy HO2 provides a sound, effective and positively prepared strategic framework for delivering the housing required to meet the objectively assessed needs of the district, which is justified with reliable and up-to-date evidence and is consistent with the approach outlined in national policy guidance.

Spatial distribution of housing development

88. The spatial distribution of housing development, outlined in Policy HO3, is dealt with under Matter 5, later in my report.

Affordable housing provision

Key issue – Is the Council’s approach to providing affordable housing appropriate, soundly based, justified with robust evidence, effective, deliverable, viable and consistent with the latest national guidance?

89. Access to affordable housing is a major issue in Bradford district. Policy HO11 aims to ensure a sufficient supply of good quality affordable housing throughout the district, and sets out the proportions of affordable housing required at new residential developments, ranging from up to 15% in inner Bradford and Keighley, up to 20% in towns, suburbs and villages, and up to 30% in Wharfedale. In the submitted BCS, the site threshold is 0.4ha/15 dwellings, except in Wharfedale and some villages, where it is lowered to 5 dwellings; affordable housing provision is also subject to viability considerations. The policy helps to meet key objectives and strategic priorities of CBMDC’s Housing Strategy and Community Strategy [PS/B001b(i)/(vii)], aiming to strike a balance between meeting the need for affordable housing and the economic viability of meeting such needs.

90. The affordable housing targets and thresholds for specific areas and settlements are informed and justified by evidence in the SHMAs [EB/050-053], and have been tested in the viability appraisals [EB/023-025; 045-046] and in other background evidence [SD/017; PS/E004f]. They reflect the relative need for affordable housing across the district, and the characteristics and market conditions of specific housing areas and settlements, including viability, affordability and proposed levels of housing provision in each sub-area of the district. Further flexibility is provided by setting targets “up to” the specific percentages. The site-size thresholds are informed by the SHMA and viability assessments, including the lower threshold in higher value areas.
91. The net need for affordable housing identified in the SHMAs (587 units/year) will be met by various means, involving private housebuilders, CBMDC’s own housing programme and other social housing partners. Firstly, by aiming to ensure that between 20-25% of total housing delivery is affordable housing, the proposed level of provision would help to meet the annual net need for affordable housing; over 7,700 units are expected to be delivered in this way (over 18% of the total housing provision) [PS/E004f]. Provision will be negotiated on a site-by-site basis, having regard to viability and site suitability, which represents a positive, effective and flexible approach, and enables changing market conditions to be taken into account, in line with national guidance (NPPF; ¶ 50; 173-174; PPG [ID-10/23b]); higher targets or levels of provision would be unrealistic, unachievable and raise viability issues. CBMDC’s own social housing programme is expected to deliver 766 affordable homes over the next 3 years, and further provision will be made by other social housing and Registered Providers. CBMDC will also develop and use grant funding sources, including those secured through the Homes & Communities Agency (HCA), and other specific measures to support the delivery of affordable housing, as well as maximising the re-use of vacant homes and opportunities offered by Council-owned land.
92. This approach is effective in enabling affordable housing to be delivered across the district, through targets and thresholds set for private housing schemes, along with other public and private sector initiatives. Significant amounts of affordable housing have been delivered in the past, ranging from 196-322 units/year (around 30% of total provision) [PS/E004f]; as overall housing provision is expected to increase, so the amount of affordable housing will increase over the period of the Plan. The policy will help to deliver affordable housing where it is most needed, based on the SHMA evidence, focused on the larger urban areas and settlements in the district, although the actual delivery and funding of affordable housing will be for CBMDC and the providers to address.
93. Some participants were concerned that the targets and site thresholds are unduly onerous. However, the viability assessments [EB/023-25/045-046] address this matter, including the cumulative impact of other policy requirements and standards; they confirm that the proposed targets and thresholds would be viable over most of the district under improving/mid-market conditions, and the differential targets reflect the characteristics of the respective housing markets, as well as the viability implications of providing affordable housing. The latest viability study [EB/046] recognises that viability will be challenging in some inner urban areas, but grant funding or other subsidies will be directed to the areas of highest need, helping to bridge the viability gap; much will depend on the circumstances of specific developments and sites. Furthermore, the policy has the flexibility to address this issue on a site-by-site basis; developers will be able to

demonstrate lack of viability, if necessary, to reflect market conditions and site/sales values, which need not be unduly onerous.

94. However, national policy on affordable housing has changed over the period of examining the BCS. In November 2014, changes were made to national policy [PPG; ID-23b], aimed at boosting development on small sites and introducing a threshold of 10 units, under which affordable housing contributions and tariff-style planning obligations should not be sought. Following a legal challenge, this guidance was revoked in February 2015, and consequential amendments were made to the PPG [ID-23b-012]. A further legal challenge reinstated the earlier position and, in May 2016, further amendments were made to the PPG confirming that affordable housing contributions should not be sought from developments of 10 units or less [ID-23b-031].
95. Following the original change to national policy, CBMDC agreed to raise the threshold for affordable housing in Wharfedale and the smaller settlements to 11 dwellings, but following the first legal challenge, proposed to reduce it to 5 dwellings; this was subject to consultation as part of the Main Modifications process. CBMDC now recognises that the original 5-dwelling threshold for Wharfedale and the smaller settlements in the submitted policy is no longer consistent with the latest national policy and agrees to amend this threshold to 11 dwellings, with consequential amendments to the wording of the policy and accompanying text **[MM108-109]** [PS/H003b].
96. Although this revised threshold would reduce the supply of new affordable housing in Wharfedale and the smaller settlements, it is likely to improve the viability of delivering smaller sites in these areas; and since it would only apply to a limited number of sites below the revised threshold, the impact on the overall delivery of affordable housing would be relatively small. The implications of this higher threshold were considered during the examination, with associated evidence [PS/F073; PS/H003b], and no formal public consultation is needed on the higher threshold. Consequently, these latest amendments are recommended to ensure that the approach in Policy HO11 accords with the latest national policy.
97. Policy HO11 also sets out the approach to rural affordable housing, including Rural Exception Sites, helping to meet the need for affordable housing in rural areas and consistent with the latest national guidance in the NPPF/PPG [ID-23b].
98. Consequently, having considered all the supporting evidence and discussions at the hearing sessions, and subject to the recommended modifications **[MM108-109]**, CBMDC’s amended approach to the provision of affordable housing is soundly based, justified with robust and up-to-date evidence, effective, deliverable, viable and consistent with the latest national policy.

Managing housing delivery

Key issue – Does the Plan provide a clear, effective and soundly based framework for managing housing delivery, which is fully justified with evidence, positively prepared and consistent with the latest national guidance?

99. Section 5.3 of the BCS also sets out policies for managing housing delivery, including phasing, density, previously developed land, principles for allocating housing sites, housing mix and quality, overcrowding, and gypsies and travellers.

Phasing

100. Policy HO4 sets out the approach to phasing new housing development, splitting the plan period into two phases, and establishing the proportion of development and the principles of allocating sites within each phase, with 61% (25,533 units) within the first phase and the remainder in the second phase; the results are shown in the updated housing trajectory. The purpose of the policy is to manage the delivery of housing growth and the release of housing sites over the plan period in a sustainable way, without constraining delivery, especially since the proposed housing requirement figure may be challenging, compared with previous trends, particularly in terms of providing infrastructure and services and the release of Green Belt land. CBMDC justifies this approach in the BCS and in supplementary evidence [PS/E007b].
101. The main concerns are whether the approach to phasing is consistent with the NPPF, and whether it would undermine housing supply or preclude sustainable and deliverable housing sites from coming forward. Policy HO4 sets the general parameters of overall housing provision within the two phases, but the precise phasing of specific housing sites will depend on further work being undertaken in the SADPD & AAPs; CBMDC confirms that there would be no bar on any type or location of site being included in the first phase, subject to suitability, availability, deliverability, viability and the provision of the necessary infrastructure.
102. Although national policy does not encourage or require the phasing of housing development, it promotes sustainable development and does not preclude the phasing of housing delivery. Phasing can be justified where there is a clear link to the provision of essential infrastructure and services [PPG: ID:12-018; ID:34-005], as in this case, where service providers support this approach. Given the significant increase in the overall scale of housing growth proposed in the BCS compared with previous plans, it would not undermine the need to significantly boost housing supply or prevent the provision of sustainable housing schemes.
103. Moreover, the phasing policy would not directly conflict with the guidance in the NPPF (¶ 47), which advises that plans should identify key sites which are critical to housing delivery and emphasises the need to maintain a 5-year supply of housing throughout the plan period, with a housing trajectory showing how this will be delivered. Nor would it lead to any shortfall in housing provision, since sufficient sites will be identified to maintain housing supply throughout the plan period, including unexpected windfall sites and a 20% buffer to the 5-year supply.
104. Consequently, given the specific circumstances of Bradford and the need to ensure that sufficient land is identified to deliver housing throughout the Plan period, the general approach to phasing should help to positively manage the delivery of new housing, without undermining housing provision or unnecessarily preventing or delaying sustainable housing development from coming forward.
105. However, some amendments are needed to the wording of the policy and the accompanying text. Firstly, clarification is needed about the scale and proportion of each phase of housing delivery and the role of the SADPD; secondly, confirmation that some large or complex sites may need to be brought forward within the first phase, where this would aid delivery within the Plan period and secure required investment and infrastructure; thirdly, that a 5-year supply (including buffer) will be maintained throughout the Plan period; fourthly, to explain how the policy will support housing delivery and regeneration, including the early release of housing sites in the AAPs and the approach where shortfalls

in supply may occur; fifthly, to confirm that the phasing policy only applies to site allocations, rather than to other sustainable housing sites (including windfalls) that may come forward in the future; and finally to amend and update the housing trajectory to show the expected delivery of housing **[MM89-92; 152-154]**. These amendments would ensure that the policy fully delivers and maintains the required supply of new housing throughout the Plan period in a clear, effective and soundly based way, and better reflects national guidance.

Density

106. Policy HO5 establishes the minimum density expected of housing developments (30dw/ha), in order to achieve the best and most efficient use of land. NPPF (¶ 47) advises planning authorities to set out their approach to housing density to reflect local circumstances. In this case, given the scale of new housing needed and land constraints (including the need to minimise the loss of Green Belt land), it is important to use land efficiently. The policy sets a reasonably modest benchmark, which should be achievable on most sites, but allows flexibility to provide higher or lower densities in particular cases. It provides a realistic starting point for discussions, with the aim of making the most effective use of specific sites. The application of the policy may result in better designs and higher yields, particularly in inner city areas, so should not adversely affect the 5-year supply of housing; in the past, most new housing schemes have achieved the minimum requirements, and the SHLAA [EB/049; PS/G004i] uses a range of densities at and above this figure. The Viability Studies [EB/045-046] confirm that this minimum density level should not have any implications for viability, given the flexible approach envisaged; higher densities may be challenging in some cases, but this will largely depend on site-specific, locational and market factors; these issues will be considered in more detail at the SADPD/AAP stage when site allocations are made, including setting local density targets.
107. However, further clarification is needed in the accompanying text to confirm that *most*, rather than all, developments should achieve the minimum density, and confirm that this relates to net density, with an associated definition **[MM93-95]**. This would ensure that the policy is clear, effective, achievable and consistent with national policy, with sufficient flexibility to respond to site-specific factors.

Use of Previously Developed Land

108. Policy HO6 aims to maximise the use of previously developed land (PDL), setting targets for the Plan period and for the Regional City, Principal Towns and Local Growth & Local Service Centres. Although the NPPF (¶ 111) *encourages* rather than *prioritises* the use of PDL, given the increased emphasis on such development, this approach is not inconsistent with current national guidance [PPG: ID-10], more recent ministerial statements and emerging national policy. The proposed targets are supported by evidence on specific sites in the SHLAA [EB/049; PS/G004i] and in the housing trajectory, and are in fact lower than rates achieved in the past; they also relate to the delivery of housing completions, rather than just to proposed site allocations. The higher targets within Bradford city reflect the supply of potential brownfield land within the urban area, whilst lower targets elsewhere reflect the need for some greenfield development, including land released from the Green Belt. While higher targets may be challenging in some cases, CBMDC confirms that they are achievable [PS/E007b]; issues of viability have been addressed in the Viability Studies [EB/045-046]. Given the increasing focus on the use of PDL, there is little evidence that the targets would adversely impact on the supply of housing, particularly since greenfield sites will continue to come forward to balance the overall supply.

109. However, to provide more flexibility and confirm that the percentages are *targets* rather than *minimum requirements*, amendments are needed to the wording of the policy and accompanying text **[MM96-98]**; an amendment is also needed to Appendix 6 (Table 3) to clarify the approach where PDL delivery targets are not being met **[MM156]**. With these recommended amendments, the policy would be clear, effective and consistent with existing and emerging national policy, with sufficient flexibility to respond to site-specific factors.

Principles for allocating new housing sites

110. Policy HO7 establishes the principles for allocating new housing sites, in order to deliver and manage growth in a sustainable way, which are key elements of national policy. It sets the strategic framework to guide the allocation of sites in subsequent plans, enabling potential sites to be compared and assessed in an objective way. It reflects the over-arching principles in Core Policy SC5 and key strategic objectives, and aligns with CBMDC’s corporate goals for achieving growth and regeneration and those of the LEP’s SEP. It also reflects the balance between homes and jobs, and between brownfield and greenfield sites established in other policies, with a range of factors to ensure the delivery of sustainable development; these include prioritising those sites which assist regeneration and address infrastructure deficiencies and maximising the use of previously developed land. It recognises the need to minimise the loss of Green Belt, whilst maximising environmental benefits and minimising environmental impacts. It provides an effective framework for allocating sites in subsequent plans, which is consistent with national policy and needs no amendments in terms of soundness.

Mix and balance of new housing

111. Policy HO8 seeks to ensure a mix and balance of new housing to meet the needs of the district’s population, with specific principles and strategic priorities. This approach is consistent with the NPPF (¶ 50; 159) and is informed by evidence in the SHMAs **[EB/050/052]**, which include a full analysis of the housing market, key market drivers and housing needs, along with other supplementary evidence **[SD/017; PS/E007b]**. Housing mix will be assessed on a site-by-site basis using published evidence and more recent evidence on local need and demand, rather than being established on a district/area-wide basis. A site size of 10 dwellings provides an appropriate threshold to provide a mix of housing, with flexibility to consider site-specific factors. The viability implications of providing a mix of housing will also be considered on a site-by-site basis, as confirmed in the Viability Studies **[EB/045-046]** and Policy ID2; this ensures that the policy requirements are effective and retain flexibility without being unduly onerous. However, the accompanying text needs to confirm that viability will be a factor when considering the appropriate housing mix on specific sites **[MM99]** in order to ensure that the policy is clear, effective and soundly based.

Design of new housing

112. Policy HO9 aims to ensure that new housing is of high quality and good design, setting out minimum standards. It is justified in the BCS and in supporting evidence **[SD/017; PS/E007b]**, whilst the Viability Studies **[EB/045-046]** confirm the need to balance viability with deliverability and provide flexibility in terms of housing quality. The need to achieve good design is a key element of the NPPF (¶ 56-59), along with the need to consider low-carbon solutions. However, some of the detailed requirements in the policy (including references to sustainable, accessible and internal space standards) are not consistent with the recent Government review of housing standards. CBMDC therefore agrees to amend the detailed

wording of the policy and accompanying text, deleting reference to the *Code for Sustainable Homes, Lifetime Homes* and internal space standards [MM100-107]. These amendments would ensure that the policy is effective, up-to-date and consistent with the latest national policy on housing standards, with sufficient flexibility to ensure that it is not unduly onerous or detrimental to the delivery of new developments. Further evidence will be needed if CBMDC wishes to seek additional standards in any subsequent plans or guidance.

Overcrowding and empty homes

113. Policy HO10 aims to address the problems of overcrowding and the number of empty homes through a series of policy interventions and investment decisions. It accords with national policy in the NPPF (¶ 51) and is supported by CBMDC’s Housing & Homelessness Strategy, Empty Homes Delivery Plan and other initiatives [PS/B001b(vii; x-xi)]; it needs no amendments in terms of soundness.

Gypsies and travellers

114. Policy HO12 sets out the approach to providing sites for gypsy and traveller communities, including locational criteria. As submitted, it aimed to provide 74 new pitches for gypsies and travellers and 22 new pitches for travelling showpeople (2008-2030); this was based on the 2008 regional Gypsy & Traveller Accommodation Assessment (GTAA) [EB/043]. However, CBMDC commissioned an update for Bradford district, in order to update the pitch requirements and address concerns about the methodology raised by gypsy organisations, but this was not completed and approved until after the initial hearings of the examination had closed. The updated GTAA [PS/G004f-g] identifies a need for 82 pitches for gypsies and travellers (2014-2019), along with 9 pitches for the longer term (2019-2030) and 7 transit pitches, and 68 plots for travelling showpeople (2014-2019) with a longer term requirement for 13 plots; with existing provision, this equates to a total need for 39 new pitches for gypsies and travellers and 45 plots for travelling showpeople, together with an additional 7 plots for transit provision. These amended requirements, along with amendments to the policy and accompanying text, were subject to consultation as part of the Main Modifications procedure, and no new issues were raised [MM110-112].
115. Consequently, with the recommended amendments, the BCS provides a clear, effective and soundly based framework for managing housing delivery, which is fully justified with evidence, positively prepared and consistent with the latest national guidance.

MATTER 4 – ECONOMY AND JOBS

Key issue – Does the Plan set out a clear, effective and soundly based economic strategy which positively and proactively encourages sustainable enterprise and economic growth, and are the policies for economic prosperity, rural economy, employment land, city, town, district and local centres appropriate for Bradford, supported by a robust, credible and up-to-date evidence base and consistent with the latest national policy?

116. Section 5.1 of the BCS sets out policies addressing Bradford’s economic strategy, to ensure that business thrives in the district, generating opportunities to deliver jobs growth and prosperity. CBMDC has provided evidence to justify the overall economic and employment strategy of the BCS [SD/018; EB/027; PS/B001b(xiv); PS/E005]; this provides the strategic context and background to Bradford’s economy, analyses its strengths, weaknesses, opportunities and requirements, having regard to the LEP’s SEP [PS/B001b(xv)].

117. Policy EC1 sets out the ways in which a successful and competitive economy will be delivered across Bradford district. It is an over-arching strategic policy which recognises the key economic drivers and establishes the spatial priorities for stimulating and managing the economy, helping to transform economic conditions and manage the benefits of economic growth across the urban and rural areas of the district as part of the wider LCR. It is underpinned by a range of sub-regional and local evidence and is consistent with the strategic priorities of the LEP’s SEP and the key factors outlined in the NPPF (¶ 18-19). Although *Economic Growth Areas* are shown on the Key Diagram, there is a need to clarify their extent, focused in the Airedale corridor, Bradford city centre, the main towns along the M606 and in the north-east/south-east Bradford/Leeds interface [PS/F057]; it is also necessary to include extraction industries in the opportunities for business relating to environmental assets **[MM63-64]**. With these recommended additions, Policy EC1 would be clear, effective and soundly-based.
118. As submitted, Policy EC2 aims to support business and job creation, with the delivery of 2,897 new jobs annually and a supply of 135ha of developable employment land over the plan period. The original jobs growth figure was related to the working age population expected to have jobs, including those who receive job-seekers allowance; but this is a theoretical and aspirational figure that assumes full employment, which is unattainable [PS/F065]. In order to provide a more realistic indication of projected jobs growth, rather than an over-optimistic aspirational figure, CBMDC proposes to reduce the annual number of new jobs to 1,600 **[MM65-67]**; this is based on the Regional Econometric Model (REM) and is closely aligned with the jobs figure used to determine housing need.
119. A further amendment to the accompanying text is needed to clarify the nature of the potential new employment land supply set out in Policy EC2, confirming that less than 52ha of the total 116ha of existing employment land is potentially suitable for new investment and economic growth; taking account of qualitative factors, an additional 83.43ha of new employment land will need to be identified in the Bradford City and Airedale sub-areas **[MM68]**; these figures will be reviewed in the SADPD when specific site allocations are made [PS/F053-a]. With these recommended amendments, Policy EC2 would be clear, effective, aligned with the housing figures and soundly based.
120. Policy EC3 indicates how the overall employment land requirement (135ha) will be distributed across the district, with 100ha within Bradford city, 30ha in the Airedale corridor and 5ha in the Wharfedale corridor. Although the REM and Employment Land Review (ELR) [EB/026-027] provide a broad picture of local economic performance and a wide range of employment land needs (125-212ha), a more appropriate estimate of land requirements is based on past development trends, including past take-up of employment land [SD/018; PS/E005]; between 1983-2013, take-up of land averaged around 12.8ha/year, but based on a more recent period of 2001-2013, taking account of economic recessions, this averaged about 9ha/year, equating to a total of 135ha up to 2030 (limited to Class B uses and excluding growth in retail, health and service sector jobs). The overall level of employment land provision has been discussed with neighbouring authorities as part of the DTC, including the potential to prejudice their regeneration prospects, but no serious issues have emerged, subject to considering the detailed implications of specific site allocations at the SADPD stage.
121. On this basis, the proposed scale of provision represents a reasonable, deliverable and justified requirement for employment land over the current plan period. However, an amendment to the policy wording is needed, to confirm that this is

the minimum level of provision, to be sound, effective and consistent with the approach in Policy EC2, enable other sustainable sites to come forward, provide flexibility and choice, and ensure positive economic growth **[MM69]**.

122. As for the spatial distribution of employment land, this is based on market analysis in the ELR and the 5 functional economic areas within the district; it also reflects population and the economic priorities in the district, including city-centre regeneration and supporting the main employment corridors and hierarchy of towns [SD/018; EB/026-27; PS/B001b(xiv); PS/E005]. This approach is consistent with national policy in NPPF (¶ 18-22; 160-161) & PPG [ID-2a/3]. Employment land provision will be made up of existing deliverable sites within the RUDP, other sites with planning permission, sites identified in regeneration strategies and masterplans, and new sites identified in the AAPs and SADPD. CBMDC also confirms that this scale and distribution of new employment land will require some releases of land from the Green Belt; the BCS identifies broad areas of search for the larger employment sites within north/south-east Bradford and east/north-east of Keighley; specific sites will be allocated in the SADPD. The proposed scale and distribution of employment land is also balanced with the employment needs and scale of new housing proposed in each sub-area, and is well-related to underlying strategy and focus of the BCS.
123. The transport and traffic implications of the proposed spatial distribution of employment development have been assessed by the district-wide Transport Study [EB/039], Local Infrastructure Plan (LIP) [EB/044; PS/M005] and the Local Transport Plan (LTP) [PS/B001b(xxiv)]; more detailed traffic assessments will be undertaken when specific sites are allocated in the SADPD. Concerns about the broad locations for new employment sites, including infrastructure, use of brownfield land, impact on the environment, and the scale and location of potential sites in Wharfedale and Airedale, will similarly be addressed in more detail when specific sites are identified and allocated.
124. With the recommended amendment, Policy EC3 will set a soundly-based framework for the provision and spatial distribution of employment land which is effective, justified, positively prepared and consistent with national policy.
125. Policy EC4 seeks to manage economic and employment growth in an effective and sustainable manner, and sets out the criteria and delivery mechanisms, which reflect key policy guidance in the NPPF (¶ 21). The approach to protecting existing employment sites reflects the need to maintain the provision of jobs and retain a range of accommodation for business uses. It sets out a series of factors which need to be addressed, reflecting the needs of businesses and including viability, accessibility, market factors, regeneration and infrastructure considerations, and taking account of pressures for higher land value uses, without unnecessarily protecting land which will be unlikely to be needed for future employment uses; this approach reflects national policy in the NPPF (¶ 22). The policy also adequately supports agricultural and rural businesses, in line with NPPF (¶ 18), recognising that over 60% of the district covers rural areas.
126. However, some amendments to the policy and accompanying text are needed to confirm that *Strategic Employment Zones* will be identified in the SADPD & AAPs, and clarify the definition as key locations within the urban areas where existing industrial and business uses predominate [PS/F055] **[MM70-71]**. With these amendments, the policy is clear, effective and soundly based.

127. Policy EC5 sets out the approach to city, town, district and local centres, including the role of each centre, the need for retail impact assessments and the approach to retail and other town centre developments within and outside the existing centres. It defines the hierarchy of centres, based on retail studies [EB/034-036] and reflecting the settlement hierarchy established in Policy SC4, and seeks to positively maintain and enhance their roles, functions, vitality and viability, including through regeneration. Amendments to the settlement hierarchy proposed for Burley-in-Wharfedale and Menston (see later) do not significantly affect their role, status and function in retail and town centre terms.
128. The policy does not indicate the capacity for additional retail/town centre development, but figures are included in the retail studies [EB/034-036], and are regularly updated. The latest update confirms that planned investments and commitments will take up all of the short-medium term spare retail capacity in the defined centres, after allowing for enhancement of market share in Bradford city centre. The approach and boundaries of town centres and primary shopping areas will be reviewed in the SADPD and AAPs. The proposed thresholds for retail and other impact assessments reflect their differing scale, function and role and the potential retail impact; this approach is justified in the supporting evidence [EB/034-036]. The policy also addresses the need for small shops and other town centre uses, including offices, residential, community, cultural, health and educational facilities.
129. As drafted, the overall approach to city, town and other centres set out in Policy EC5 is consistent with national policy in the NPPF (¶ 23-27), and provides an appropriate, effective, comprehensive and soundly-based framework for establishing the hierarchy of centres, maintaining and enhancing their roles, and for considering development proposals within and outside them.
130. Consequently, with the recommended amendments **[MM63-71]**, the Plan sets out a clear, effective and soundly based economic strategy, which positively and proactively encourages sustainable enterprise and economic growth, is supported by robust, credible and up-to-date evidence and is consistent with the latest national policy.

MATTER 5 – SETTLEMENT HIERARCHY, SPATIAL DISTRIBUTION OF DEVELOPMENT AND SUB-AREA POLICIES

Key issue – Are the proposed Settlement Hierarchy, Spatial Distribution of Development and the Sub-Area Policies soundly based, effective, appropriate, deliverable, locally distinctive and justified by robust, proportionate and credible evidence, positively prepared and consistent with national policy, particularly in delivering the proposed amount of housing, employment and other development?

131. The proposed settlement hierarchy, spatial distribution of development and the policies for the individual sub-areas are probably the most contentious elements of the Plan. Although these aspects are dealt with under separate policies and sections of the Plan, they raise similar issues and concerns, and it is appropriate to deal with these matters comprehensively, in order to avoid duplication and repetition. The issues and concerns principally relate to Policies SC4, HO3, BD1-BD2, AD1-AD2, WD1-WD2 and PN1-PN2.

General context

Settlement Hierarchy

132. Core Policy SC4 sets out the proposed hierarchy of settlements, including the Regional City of Bradford (with Shipley & Lower Baildon), Principal Towns (Keighley, Bingley & Ilkley), Local Growth Centres (Queensbury, Thornton, Steeton with Eastburn & Silsden) and Local Service Centres, along with a framework for making planning and investment decisions. Following the work undertaken on the updated HRA [PS/G004h], CBMDC proposes to reclassify Burley-in-Wharfedale and Menston as Local Growth Centres, rather than Local Service Centres; this amendment was subject to the Main Modifications consultation and discussed at the resumed hearings.
133. The settlement hierarchy stems from work on the revoked YHRSS, but is now based on the 2011 Settlement Study [EB/040-042] and later Growth Study [EB/037]. It aims to direct growth to the most sustainable and accessible towns and settlements in the district; the ability of settlements to accommodate growth is based on potential housing land availability identified in the SHLAA [EB/049; PS/G004i]. CBMDC tested 4 options with a range of different development strategies and settlement hierarchies, supported by SA work, and the selected hierarchy broadly reflects the approach in the adopted RUDP; the Local Infrastructure Plan (LIP) [EB/044; PS/M005] identifies the critical infrastructure requirements associated with the proposed settlement hierarchy. Although some services and facilities in the towns and settlements may come and go, CBMDC confirms that there have been no material changes to the position when the Settlement Study and Growth Study were produced. Moreover, the latest land supply position in the updated SHLAA [PS/G004i] confirms the potential of the designated settlements to accommodate the proposed levels of growth.
134. From considering all the evidence and discussions at the hearings, it is clear that the original settlement hierarchy set out in the submitted Plan was unduly influenced by the flawed HRA work, particularly in terms of Burley-in-Wharfedale and Menston. However, and subject to my conclusions later in this section of my report, the approach of the revised settlement hierarchy seems to be more appropriate, properly justified by the updated HRA work and soundly based.

Spatial Distribution of Development

135. Policy HO3 sets out the broad distribution of housing development to the Regional City of Bradford, the Principal Towns, Local Growth Centres and Local Service Centres, including the various settlements within each of the sub-areas. Having considered all the evidence and discussions, it is clear that the spatial distribution originally set out in the submitted BCS was not fully justified; in some cases it was unduly influenced by a flawed HRA, with insufficient justification for reducing the apportionment to some settlements, and in other cases, there are doubts over delivering the proposed amounts of development in terms of the latest housing land supply assessment and potential impact on heritage assets.
136. Following discussions at the first round of hearings, and as a result of the revised HRA [PS/G004h; PS/F019], CBMDC set out a revised spatial distribution of development, which was the subject of Proposed Modifications and public consultation. Since this revised apportionment of development represents the Council’s latest position, it is this spatial distribution which needs to be assessed in terms of soundness. Both the original and revised spatial distributions of development are contentious locally, and need careful examination.

137. There are four general principles guiding the spatial distribution of development: alignment with the BCS’ vision and objectives; and with the settlement hierarchy; maximising the benefits of development and growth; and minimising the impact on critical environmental assets. The process started with a baseline distribution of housing based on the existing population of each sub-area and settlement. This was adjusted through a process of reality checking, taking account of land supply, the Growth Study [EB/037], Viability Assessments [EB/045-046], HRA and habitat surveys, flood risk and the sequential approach to the distribution of housing growth, transport modelling, infrastructure and environmental constraints; other factors included deliverability, key drivers of population and housing growth, including housing need and demand, maximising the use of brownfield land, minimising the loss of Green Belt, delivering affordable housing and regeneration priorities [SD/016-018; PS/E004b-c; PS/E005; PS/F018; PS/K002; PS/L001-009]. The amended distribution largely results from the revised HRA work, an updated land supply assessment [PS/G004i] and a further assessment of the need to reduce potential impacts on areas of historic interest [PS/K002].
138. Not surprisingly, the majority of new development is to be focused on the Regional City of Bradford, which has the most population. Under the revised spatial distribution, it is expected to take some 66% of the housing growth and the majority of employment development (100ha). This reflects its regional importance and its role, function and position in the settlement hierarchy of Bradford district, as well as the presence of brownfield land, regeneration opportunities and the potential supply of housing and employment land, including releases from the Green Belt.
139. The Principal Towns of *Keighley, Bingley & Ilkley* are now expected to take 17% (6,900 dwellings) of the housing growth. The individual targets are slightly above or below the baseline population proportion, reflecting Green Belt constraints and the potential supply of housing land. The increased target proposed for *Ilkley* is largely due to the less precautionary approach of the updated HRA work and the updated assessment of potential housing land.
140. The Local Growth Centres (LGC) (*Queensbury, Thornton, Silsden, Steeton with Eastburn* and now including *Burley-in-Wharfedale* and *Menston*) are now expected to take just over 11% of overall housing growth (4,900 dwellings). These apportionments are generally above the baseline population proportion, recognising the LGC’s role and function, as well as their accessibility along main transport corridors, potential to accommodate some growth, and the latest assessment of housing land supply. The increased amount of development now proposed at Silsden, Burley & Menston is largely due to the less precautionary approach of the revised HRA work and the updated assessment of potential housing land.
141. The Local Service Centres (LSC) are now expected to take about 6% of overall housing growth (2,550 dwellings); the individual targets are mainly slightly below the baseline population proportion, recognising available land supply and physical/policy constraints. These settlements tend to be smaller and less sustainable than the LGCs, with fewer facilities and less potential to accommodate growth; the focus is on meeting local needs and supporting existing services. The revised apportionments for *Baildon* and *Haworth* are due to concerns about the potential impact of development on the setting of the Saltaire World Heritage Site (WHS) or on the character and setting of Haworth Conservation Area.

142. Policies EC1-EC4 (see earlier in my report) deal with the amount and spatial distribution of new employment land, confirming that of the total 135ha, at least 100ha will be allocated to the Regional City of Bradford, 30ha to the Airedale corridor and 5ha to Wharfedale. This will involve selective Green Belt deletions in North Bradford, South-East Bradford and Keighley.
143. Before dealing with the detailed distribution of development, there are some common issues and concerns that need to be addressed, the first of which is the loss of Green Belt. Bradford city and most towns and settlements within the district are tightly constrained by a long-established Green Belt; there is little undeveloped or uncommitted land within or on the periphery of the built-up areas and, even maximising the use of brownfield land, some additional greenfield development is needed to fully meet the overall housing requirement, including sustainable locations within the existing Green Belt. The Growth Study [EB/037] assessed the impact of growth on the purposes of the Green Belt and identified broad locations where its purposes and functions would not be seriously undermined; a subsequent selective detailed Green Belt review will examine this matter further and inform the selection of specific sites in the SADPD. National policy (NPPF; ¶ 83) allows Green Belt boundaries to be reviewed as part of the local plan process, and CBMDC has demonstrated that exceptional circumstances exist to justify some development in the Green Belt (see earlier in my report).
144. Secondly, there are concerns about the ability of existing infrastructure and facilities to accommodate the proposed amount of housing envisaged at the various settlements, including traffic, transport and education. The district-wide Transport Study [EB/039] assessed the strategic position and identifies constraints and issues, reflecting the Local Transport Plan [PS/B001b(xxiv)]; further work will be undertaken at the site selection and allocation stage [PS/M011]. The Local Infrastructure Plan (LIP) [EB/044; PS/M005] identifies the critical infrastructure and improvements necessary to accommodate the scale of proposed development in each sub-area and settlement. CBMDC regularly liaises with transport, health and education authorities to ensure sufficient capacity is provided to accommodate the needs of new development, and most service providers are under a statutory obligation to ensure that capacity is available to serve new developments. In some cases, new development can enhance or improve existing facilities and services, as well as providing new facilities.
145. Flooding is a particular issue in many areas of Bradford district, not only in parts of the city centre and Shipley, but also along the Aire & Wharfe river valleys, as demonstrated in recent flooding events; groundwater flooding is also an issue in places on the edge of the moors like Menston. CBMDC has prepared a Stage 1 Strategic Flood Risk Assessment (SFRA) [EB/048], agreed with the Environment Agency (EA); this considers all types of flooding using the most up-to-date information available at the time, and CBMDC is currently preparing its own Flood Risk Management Strategy. Further work has been undertaken on the sequential testing of potential development sites [PS/F060; PS/L011; PS/M007; PS/M010] and more detailed work will be undertaken during the site selection and allocation stage. Much will depend on the selection and allocation of specific sites, but at this strategic stage, it is important to note that the latest sequential testing work [PS/M010] confirms that very few potential sites lie within Flood Risk 2 or 3a zones, and in places like Menston, Burley & Ilkley, the proposed scale of development can easily be accommodated on land outside these zones. More detailed guidance on the assessment of flood risk is provided by Policy EN7.

146. As for the likely proportion of development on brownfield and greenfield land, much will depend on the selection of specific sites, but the latest land supply assessment identifies potential brownfield and greenfield sites, and CBMDC aims to maximise the amount of development on brownfield sites. Policy HO6 sets an overall target of 50% of new housing on brownfield land, ranging from 55% within Bradford city to 15% in Local Growth Centres, reflecting the availability of brownfield land within these settlements. However, not all the required development can be accommodated on brownfield sites, due to issues of suitability, availability, viability and deliverability, and some development will have to take place on greenfield sites, including Green Belt land, in order to fully meet the overall housing requirement figure; this is shown in the comprehensive land supply assessment in the earlier and latest SHLAAs [EB/049; PS/G004i].
147. The revised spatial distribution of development is somewhat different to that set out in the earlier BCS FED. However, that previous apportionment was based on earlier evidence and on a higher overall level of housing development for the district; work undertaken on the original HRA and SHLAA also affected the revised distribution in the submitted BCS, and further HRA & SHLAA work during this examination has influenced the latest revised spatial distribution.
148. In general terms, the underlying strategy of concentrating most new development at key settlements within the district represents an appropriate, effective, deliverable and soundly based strategy, resulting in a sustainable pattern of development, in line with national policy. Subject to my conclusions later in this section, the general approach to the revised spatial distribution of development proposed for the main towns and settlements seems to be reasonable and proportionate in terms of their existing size, form, role and accessibility, the proportion of population, and their potential capacity to accommodate growth.

Sub-area policies

149. The sub-area policies set out the spatial development framework for each of the sub-areas of Bradford district, confirming the strategic pattern of development, including the broad distribution of housing and other development, along with the priorities for each sub-area, the nature and broad locations of the proposed growth, and policies for economic development, the environment and transport, highlighting the outcomes by the end of the plan period and investment priorities.

Regional City of Bradford, including Shipley and Lower Baildon

150. Policy BD1 sets out the strategic pattern of development for Bradford City, including urban regeneration and renewal priorities, and levels of growth in the various areas of the city, and outlines the detailed strategy for growth, economic development, the environment and transport in this sub-area [PS/E006a]. In terms of the settlement hierarchy, there can be little dispute that the *City of Bradford* (with Shipley & Lower Baildon) should lie at the top of the hierarchy, as the largest urban area with the most population, regional services, housing, employment, retail, health, leisure and cultural facilities, and good accessibility to neighbouring towns; this would also accord with its current and future role, and with the LEP’s SEP [PS/B001b(xv)]. The latest SHLAA [PS/G004i] confirms the ability of Bradford city to accommodate most of the proposed housing growth.
151. As regards the proposed spatial distribution of development, this focuses most new development on the Regional City of Bradford. As revised, Bradford City is expected to provide 27,750 dwellings, divided between the city centre, Canal

Road, Shipley and the four quadrants of the city, along with at least 100ha of employment land. The proposed reduction in housing for Bradford city, compared with the submitted BCS, (-900 dwellings) results from the revised apportionments proposed for Canal Road (3,100 dwellings; -100), Bradford NE (4,400 dwellings; -300) and Shipley (750 dwellings; -500).

152. In *Bradford city centre* (3,500 dwellings), development is likely to be focused on brownfield and redevelopment sites, including new sites and re-use of existing sites, with major growth, including employment. The latest SHLAA confirms that sufficient sites can be identified to meet this target and specific site allocations will be made in the emerging Bradford City Centre AAP.
153. The deliverability of the amount and type of proposed development in *Bradford city centre* is a key issue, with its focus on regeneration, redevelopment and use of brownfield land. The Viability Assessments [EB/045-046] show that delivery and viability are likely to be challenging in some cases, but CBMDC envisages a range of public and private interventions and initiatives to encourage and stimulate development, particularly for housing and employment; with continued improvement in market conditions and some flexibility in site allocations, viability issues can be addressed, in line with Policy ID2. I also understand that the apportionment to the city centre has been reduced from the total potential capacity identified in the latest SHLAA to reflect deliverability and viability factors.
154. The city centre is the focus of the district, rightly taking a good proportion of the overall development, and it is entirely appropriate that development is focused on this area, including a wide range of associated commercial, retail, cultural and leisure facilities. Extensive work has been undertaken in the City Centre Masterplan and neighbourhood design frameworks, carried forward in the emerging AAP, which examines key issues in more detail, with the aim of delivering the BCS’ strategy. CBMDC has drawn a reasonable balance between the need to focus new development in the city centre and recognising the challenges and realistic opportunities, for which there is a reasonable prospect of success and delivery within the plan period.
155. The revised apportionments for *Canal Road* and *Shipley* are largely based on a re-assessment of land supply and detailed work undertaken for the Shipley & Canal Road Corridor AAP. Proposals for development in the *Shipley & Canal Road Corridor* are well advanced, with the New Bolton Woods Masterplan, Strategic Development Framework, design work, technical studies and various planning applications, addressed in detail in the emerging AAP; the AAP will also address the need for the Shipley Eastern Link Road, referred to in the LIP [EB/044; PS/M005].
156. For *Shipley*, the lower figure is also due to boundary adjustments and concerns from Historic England (HE) about the potential impact of some development sites on the Saltaire WHS; the updated SHLAA confirms that sufficient land can be identified to meet the revised apportionment without having an adverse impact on this important heritage site. Until site-specific heritage impact assessments have been undertaken, it is appropriate to adopt a more precautionary approach which reflects the possible impact of some potential sites on the WHS. It is also worth noting that much of Shipley is already included in the Shipley & Canal Road Corridor AAP area, where a further 700 dwellings are proposed. However, in view of the reduction in the amount of new housing at Shipley, and to address HE’s concerns, clarification is needed about the nature of such development and the need to conserve those elements which contribute to the Saltaire WHS **[MM42]**.

157. *Bradford SE* is a sustainable area of the city, with regeneration priorities, and with the potential to accommodate a significant amount of new development, both on brownfield and greenfield sites, as confirmed in the latest SHLAA [PS/G004i]. The proposed apportionment for this area (6,000 dwellings) will require development and remodelling within the urban area, including a new Sustainable Urban Extension (SUE) at Holme Wood, currently in the Green Belt, which many local residents seek to remove from the BCS. Much of the justification for this project is provided in the Holme Wood & Tong Neighbourhood Development Plan (HWTNDP) [PS/B001b(iii)], which examined options for the long-term sustainable regeneration of the wider area, particularly the Holme Wood housing estate, including a SUE involving a change to Green Belt boundaries.
158. The submitted evidence (including the Growth Study [EB/037]) endorses the general principle of a SUE in this broad location and confirms that the area around Holme Wood could be allocated without undermining the key functions of the Green Belt, including the break between Leeds and Bradford; CBMDC has also demonstrated legitimate exceptional circumstances to justify amending Green Belt boundaries in this locality. Further work, including the detailed scale, extent and boundaries of the SUE and associated infrastructure and facilities, along with the impact on the local landscape of the Tong and Fulneck Valley and the nearby Conservation Area, will be undertaken in the forthcoming SADP.
159. The SUE will also facilitate the regeneration of Holme Wood housing estate, with cross-investment and improved linkages with the existing community, as well as providing new facilities and greenspaces. The proposed SE Bradford access route (included in the LTP and funded by the WYCA) could form a defensible long-term boundary to the SUE, as well as providing a strategic highway link between the M62 and Leeds-Bradford airport. Improvements to the A650 will also help to facilitate development and alleviate existing traffic congestion; key infrastructure requirements are set out in the LIP [EB/044; PS/M005].
160. The scale of the proposed development and associated infrastructure mean that it will probably not come forward until 2021. However, it is an active proposal, supported by development partners, which would help to produce a sustainable and integrated community. CBMDC has consulted and engaged with LCC about the project as part of the DTC, and has addressed issues raised by Historic England about its possible impact on Adwalton Moor Registered Battlefield, including undertaking a heritage impact assessment. Moreover, with many potential sites, delivery of the proposed level of development at SE Bradford does not solely depend on the Holme Wood SUE. Consequently, at this strategic level, the proposed amount of development, including the general principle of a SUE in this broad location, is justified and soundly based.
161. At *Bradford NW* (4,500 dwellings) and *Bradford SW* (5,500 dwellings), development is likely to be delivered by a mix of sites, including redevelopment and intensification within the urban area, along with a substantial contribution from sustainable Green Belt locations; the latest SHLAA confirms that sufficient land can be identified to meet these housing targets, including both brownfield and greenfield sites. However, for consistency and to clarify that the level of provision at Bradford SW is not a ceiling, an amendment to Criterion C4 of Policy BD1 is needed **[MM41]**.
162. For *Bradford NE*, the revised apportionment (4,400 dwellings) is based on an updated assessment of suitable, deliverable and developable housing land in the latest SHLAA [PS/G004i]; delivery of this level of development will require some

changes to Green Belt in sustainable locations, and details of improvements to roads and infrastructure are set out in the LIP [EB/044; PS/M005]. However, to increase the target to the previously proposed level would undoubtedly require further Green Belt releases and, based on current land availability, may not be deliverable. The Key Diagram confirms that North-East Bradford is proposed for economic development, including designation as an Economic Growth Area. However, clarification is needed about the nature of the Apperley Bridge/Esholt employment opportunity as a new high quality scheme, including research and development, rather than being led by such development **[MM40]**. CBMDC is also considering re-positioning the relevant symbol on the sub-area diagram, but any changes would be made as an Additional Modification [PS/M016].

163. Policy BD1 also sets out the strategic framework for economic development in the Regional City, including the amount, type and broad location of new employment development and associated facilities, reinforcing the role of the city centre and supported by economic evidence [SD/018; EB/027; PS/B001b(xiv-xv)]; with the amendment to Policy EC3 (see earlier), it also provides the flexibility to provide more employment land, if necessary. Key environmental issues are identified, including the role of the Green Belt between Leeds and Bradford, green infrastructure and recreation provision, and heritage assets; however, clarification of Criterion E5 of Policy BD1 is needed to include all of the key heritage assets in Bradford city centre **[MM43]**. The Policy also identifies the key transport improvements needed to accommodate the amount of proposed development, including changes to modal shift and key road and public transport projects, supported by transport evidence [EB/039; PS/B001b (xxxii-xxvi)] and identified in the LIP [EB/044; PS/M005]. The key outcomes of the policy are aspirational, but are realistic, capable of being delivered and supported by evidence.
164. Policy BD2 sets out the public and private sector investment priorities for Bradford City, in order to deliver transformation and change through economic development, housing renewal and growth, improved green infrastructure, community facilities and accessibility. The submitted evidence confirms that there is a realistic prospect of delivering these outcomes.
165. Consequently, I conclude that the settlement hierarchy, spatial distribution of development and sub-area policies for the Regional City of Bradford are appropriate, fully justified, effective and soundly based. However, to reflect changes to the spatial distribution, amendments are needed to Policies HO3 & BD1, for consistency and soundness **[MM38-43; 76-80; 86-87]**. With these and the other recommended changes, the amended policies set out a soundly based strategic framework for the future development of the Regional City of Bradford to guide development decisions and allocate specific sites in the AAPs and SADP.

Airedale

166. Policy AD1 sets out the strategic pattern of development in Airedale, including urban regeneration, renewal and new housing provision, levels of growth in Keighley and the other settlements, and the detailed strategy for economic development, the environment and transport; the expected outcomes are set out in the accompanying text [PS/E006b]. The strategy is informed by the earlier Airedale Masterplan, which identifies key issues and potential development sites, and the LEP’s SEP continues to advocate growth in this corridor [PS/B001b(xv-xvii)]. Airedale benefits from being located along the key transport corridor of the main A650 and Skipton-Leeds/Bradford railway line, and is now proposed to accommodate 8,450 new dwellings and at least 30ha of new employment land.

167. In terms of the settlement hierarchy, *Keighley* and *Bingley* are appropriately designated as Principal Towns, as the main focus for housing, employment, shopping, leisure, education, health and cultural facilities. *Keighley* is the largest town in Airedale, with a wide range of retail, employment, leisure and other services and facilities, good road and rail links to Bradford, and with the potential for regeneration and growth. *Bingley* has a focal role within Airedale, with a good range of facilities, shops and employment, and good rail and road accessibility to Bradford; its designation in the BCS reflects its similar status in the RUDP and recognises its role and opportunities for regeneration and growth.
168. The targets for Keighley (4,500 dwellings) and Bingley (1,400 dwellings) are slightly above or below the baseline population proportion, reflecting Green Belt constraints and the potential supply of housing land, and the latest SHLAA [PS/G004i] confirms that sufficient land can be identified to meet the proposed levels of development; both Keighley and Bingley are also key regeneration priorities, with a range of services, facilities and employment. There are issues relating to drainage and sewerage infrastructure, which may affect the phasing of development, but these are being addressed under Policy AD2 [PS/M005].
169. *Silsden* and *Steeton with Eastburn* are designated as Local Growth Centres. The proposed apportionments are slightly above the baseline population proportion, recognising their role, function, accessibility, sustainable location along main transport corridors, potential to accommodate growth and the latest assessment of housing land supply. The increased amount of development now proposed at *Silsden* (+200 dwellings) is largely due to the less precautionary approach of the revised HRA work and an updated assessment of potential housing land.
170. Some concerns have been raised about the ability of *Silsden* to deliver the amount of expected growth, particularly in terms of flood risk and infrastructure, including schools. However, these factors do not detract from its proposed position in the settlement hierarchy. *Silsden* is a hub for the upper Airedale/ Wharfedale communities, and the updated HRA work indicates that the increased amount of development could be accommodated without having an adverse impact on the integrity of the South Pennine Moors SAC. The latest SHLAA [PS/G004i] identifies sufficient potential land to meet the increased figure without using any land in the Green Belt or within Flood Risk Zones 2a or 3. CBMDC has identified no infrastructure issues which cannot be addressed by the relevant service providers when the detailed location and size of development sites has been established in the SADPD; critical infrastructure is identified in the LIP [EB/044; PS/M005]. No service providers have raised objections to the original or revised target figure, and issues relating to drainage, flood risk, school capacity, traffic and transport investment (including the Eastern Relief Road) will be addressed in more detail at the site allocations stage.
171. Some participants sought higher apportionments for *Steeton* and *Thornton*, since these are sustainable and accessible settlements, which might have the capacity to accommodate more growth. However, the latest SHLAA confirms that, whilst there are sufficient potential housing sites to meet the proposed apportionments, higher levels of development would probably involve greater loss of Green Belt land and/or development in flood risk areas. Some compare *Steeton* with *Silsden*, but these settlements have different characteristics, with the latter having more facilities, more potential land available without using Green Belt, and easy access to the railway station at *Steeton*.

172. *Baildon* and *Cottingley* are designated as Local Service Centres. The proposed apportionment to *Baildon* has been reduced, due to Historic England’s concerns about the potential impact of some development sites on the Saltaire WHS. No site-specific assessments have been undertaken, and no sites have been ruled out; but until detailed heritage impact assessments have been undertaken, a more precautionary approach needs to be taken towards the development potential of *Baildon*. These concerns affect only a small number of potential sites, and the latest SHLAA confirms that sufficient sites can be identified to meet the revised apportionment without using sites which might affect the Saltaire WHS. Much will depend on the selection of specific sites, as part of the SADPD process, but *Baildon* lies at the lowest tier of the settlement hierarchy and is tightly constrained by the Green Belt; there is also some doubt about whether the original targets can be met. Since there are alternative options for the spatial distribution of development, a small reduction to its apportionment is appropriate.
173. Some participants suggested that *Cottingley* should be designated as a LGC, pressing the case for more development. However, it is a relatively small settlement with a limited range of facilities and is tightly surrounded by the Green Belt, with land at risk of flooding on its northern edge; increased development here could compromise both these areas of land. Similar Green Belt constraints apply at *East Morton*. However, clarification is needed about the nature of new housing at *Cottingley* and *East Morton* to remove any requirement for local housing need assessments and the reference to local need [PS/F032] **[MM46]**.
174. Policy AD1 also sets out the strategic framework for economic development, including the amount, type and broad location of new employment development and associated facilities at *Keighley*, *Bingley* and *Silsden*, supported by specific evidence [SD/018; EB/027; PS/B001b (xiv-xv)]. Key environmental issues are identified, including the need to protect the integrity of the South Pennine Moors SAC/SPA, improvements to green infrastructure, river and canals, woodland, heritage assets and renewable energy. However, to reflect changes to the approach to the South Pennine Moors SAC/SPA in amended Policy SC8, amendments are needed to criterion E2 of Policy AD1, as agreed with NE **[MM48]**. A further amendment is needed to criterion D6 to cover all the elements which make a significant contribution to the character of this sub-area **[MM49]**. The Policy also identifies the key transport improvements needed to accommodate the amount of proposed development, including changes to modal shift and key road and public transport projects, supported by specific evidence [EB/039; PS/B001b (xxiv-xxvi)] and highlighted in the LIP [EB/044; PS/M005].
175. Policy AD2 sets out the public and private sector investment priorities for *Airedale*, in order to deliver transformation and change through economic development, housing renewal and growth, green infrastructure, community facilities and accessibility. A constraint to development in this sub-area is the capacity of the *Aire Valley Trunk Sewer*, and a specific reference is required in Policy AD2 to the need to work with *Yorkshire Water* and the EA to examine the water/waste water infrastructure needed to support growth and ensure that any development is aligned with investment in asset management and catchment management plans, in the interests of effectiveness and soundness **[MM50]**.
176. Consequently, I conclude that the settlement hierarchy, spatial distribution of development and sub-area policies for *Airedale* are appropriate, fully justified, effective and soundly based. However, to reflect the changes to the spatial distribution (including *Keighley*, *Bingley* and *Silsden*), Policies HO3 & AD1 need amending, for consistency and accuracy **[MM44-45; 47; 81-85 & 88]**. With

these and the other recommended modifications, the amended policies set out a soundly based strategic framework for the future development of Airedale to guide development decisions and identify and allocate specific sites in the SADP.

Wharfedale

177. Policy WD1 sets out the strategic framework to guide new housing provision in Wharfedale, including affordable housing. Wharfedale is now proposed to accommodate 2,500 new dwellings (6% of the total) and at least 5ha of new employment land. Increases to the apportionments are now proposed for *Ilkley*, *Burley-in-Wharfedale* and *Menston*, largely as a result of the revised designation of Burley and Menston as Local Growth Centres, due to the updated HRA work and an updated assessment of housing land availability in the latest SHLAA.
178. In terms of the settlement hierarchy, *Ilkley* is the main town in this part of Wharfedale, with Roman origins, developed as a Victorian spa town, and now a popular tourist destination; it has a good range of shops, leisure and local services, with some employment and good accessibility by road and rail to Leeds and Bradford. It is tightly contained by the Green Belt, and at times experiences road congestion and flooding in the lower parts of the valley, but these constraints do not undermine its established role as the Principal Town in this part of Wharfedale.
179. *Ilkley* now has a target of 1,000 dwellings (increased by 200), recognising that the original apportionment was significantly less than the baseline population proportion, and reflecting the less precautionary approach of the updated HRA work [PS/G004h]. The latest SHLAA confirms that sufficient potential housing sites can be identified to meet this revised level of development without having to utilise land within Flood Zones 2 or 3a. Given the tightly constrained Green Belt boundary around Ilkley and the lack of brownfield sites within the built-up area, a significant contribution from Green Belt land will be needed to meet the development target, as recognised in Policy WD1. Much will depend on the detailed selection and allocation of specific sites, but the Growth Study [EB/037] assessed the implications of development around Ilkley on the Green Belt and confirms that the proposed scale of development could be accommodated without seriously undermining its purposes or functions. Detailed impact on the local landscape and environment would be assessed at the site allocations stage.
180. As regards traffic and transport, further transport studies are to be undertaken at the site allocations stage, including the A65 corridor, and the capacity, frequency and quality of the rail service is likely to be improved over the period of this Plan; key infrastructure requirements are also addressed in the LIP [PS/M005]. New development of the size and scale anticipated may enhance and improve the provision of existing facilities, including the possibility of a new secondary school; further employment opportunities are also likely to be provided, including a new business park, along with affordable housing and parkland. There seems to be some scope for a carefully designed and controlled expansion of the town to the west and/or east without seriously affecting the form or setting of the town, causing coalescence or undermining the purposes and functions of the Green Belt. On this basis, the revised apportionment to Ilkley is appropriate, proportionate, justified, deliverable and soundly based.
181. Both *Burley-in-Wharfedale* and *Menston* were designated as LGCs in the BCS FED, but were downgraded in the submitted BCS because of the unduly precautionary approach taken in the original HRA work [SD/021]. They have now been re-designated as LGCs, largely on the basis of the less precautionary approach of

the revised HRA work [PS/G004h], supported by the latest land supply assessment [PS/GF004i]. The revised apportionments envisage 700 new dwellings at Burley (+ 500) and 600 dwellings at Menston (+ 200).

182. These are smaller settlements than some other LGCs, but have a good range of local facilities and services, including shops, health, education and community facilities. They are sustainable settlements, are popular places to live in, have grown in the past and have a strong demand for new housing. There are few employment opportunities, but they have good accessibility by road and rail to jobs in Leeds, Bradford and elsewhere. They are tightly constrained by the Green Belt and, given the lack of existing brownfield and greenfield sites within the built-up areas, significant areas of Green Belt land would be needed to meet these targets. However, the Growth Study [EB/037] assessed the impact of the proposed levels of development on the purposes of the Green Belt and concludes that there is the potential to accommodate some growth without coalescence or undermining Green Belt purposes. Nevertheless, the policy should confirm that a significant contribution from the Green Belt will be needed at Burley to meet the amended scale of development proposed and delete reference to local needs; for Menston, the policy should confirm that some local Green Belt changes will be needed to meet the amended development targets **[MM8; 52]**.
183. At times, parts of these settlements and their surroundings can be affected by flooding, and the main A65 can become congested at peak times, but these constraints do not adversely affect their current or future role and function or their ability to accommodate some future growth in a sustainable manner. There are concerns that insufficient information is available about flooding, including groundwater flooding at Menston, but CBMDC and the service providers are well aware of the situation and are progressing further work to identify and provide a solution to current problems [PC/M007]. Moreover, the latest SHLAA confirms that more than sufficient land can be identified in both settlements to meet these increased targets, none of which would be in Flood Risk Zones 2a or 3. There are concerns about the potential impact on the South Pennine Moors SAC/SPA, but the updated HRA work confirms that the increased targets are highly likely to be capable of being accommodated without adversely affecting the integrity of the South Pennine Moors SAC. Detailed assessments of flood risk (including groundwater flooding) [PS/M007], impact on the landscape, heritage and environment and infrastructure would largely depend on the selection of specific sites, to be addressed at the site allocation stage.
184. These settlements are close to the border with Leeds, but cross-boundary issues (including High Royds, education and traffic/transport) have been addressed through the DTC. More traffic would be generated, but CBMDC intends to further examine the A65 transport corridor at the SADPD stage [PS/M011]. The capacity of existing facilities would be reassessed at the site allocations stage; at Burley, the provision of a new primary school is likely as part of the proposed development. CBMDC is also liaising with the education and transport authorities about particular cross-boundary issues. There are no outstanding DTC issues raised by the proposed designation or levels of development at these settlements.
185. The proposed apportionments would represent a significant increase in the number of dwellings at these settlements, but both have grown in the past and these proposals would continue past trends at a relatively modest rate over the period of the Plan. Consequently, the revised apportionments for Burley and Menston are appropriate, reasonable and proportionate to the size, form and role of the

settlements, given their sustainable location along the main A65 transport corridor and their potential to accommodate further growth.

186. Some participants sought more development at *Addingham*, but this is not supported by local residents. The BCS FED allocated more housing to this settlement, but this was reduced in the submitted Plan due to the original HRA work; it was not increased as a result of the updated HRA work. The latest SHLAA confirms that sufficient potential land can be identified to meet the proposed apportionment without using Green Belt or sites in flood risk areas. However, an increased amount of development or identification of “reserve” sites would not be justified, since it would probably require the use of sites in the Green Belt and/or within flood risk areas, and could raise issues about potential impact on the South Pennine Moors SAC; Addingham is also lower in the hierarchy, less well located and less accessible than the other larger towns and settlements in Wharfedale. However, clarification is needed to delete reference to local needs and confirm that a smaller scale of housing and provision of local facilities is proposed at LSCs like Addingham, without the need to change Green Belt boundaries **[MM8; 10 & 55]**.
187. Policy WD1 also sets out the strategic framework for economic development, including the role of Ilkley, Burley, Addingham and Menston, and the nature of associated employment, retail and leisure development; this is supported by specific evidence [EB/027; PS/B001 (xiv)], and the amendment to Policy EC3 (see earlier) provides the flexibility to provide more employment land if required. Key environmental issues are identified, including the need to protect the integrity of the South Pennine Moors SAC/SPA and the role of the River Wharfe, green infrastructure, field patterns, tree cover and the wider river and moorland context. However, Policy WD1 needs amending to reflect the changes to the approach to the South Pennine Moors SAC/SPA in amended Policy SC8, including mitigation and the loss of foraging land, as agreed with NE **[MM53]**. Criterion D5 also needs amending to cover all the key heritage assets which need to be conserved and enhanced in Wharfedale **[MM54]**.
188. Policy WD1 also identifies the main transport improvements needed to accommodate the amount of proposed development, including changes to modal shift and key road and public transport projects. CBMDC is fully aware of traffic issues relating to the A65, on which further work will be undertaken at the SADPD stage, and key infrastructure requirements, including transport schemes and new/expanded facilities, are set out in the latest LIP [PS/M005].
189. Policy WD2 sets out the public and private sector investment priorities for Wharfedale, in order to deliver transformation and change through economic development, housing growth, improved green infrastructure, community facilities and accessibility. The submitted evidence confirms that there is a realistic prospect of delivering these outcomes.
190. Consequently, I conclude that the settlement hierarchy, spatial distribution of development and sub-area policies for Wharfedale are appropriate, fully justified, effective and soundly based. However, to reflect the changes to the settlement hierarchy and spatial distribution (including Ilkley, Burley-in-Wharfedale and Menston), Policies SC4, HO3 & WD1 need amending, for consistency and accuracy **[MM7-12; 44-45; 47; 75; 81-85 & 88]**. With these and the other recommended modifications, the amended policies set out a soundly based strategic framework for the future development of Wharfedale to guide development decisions and identify and allocate specific sites in the SADPD.

South Pennine Towns & Villages

191. Policy PN1 sets out the strategic pattern of development for the South Pennine Towns and Villages, including focusing new housing and economic growth at the main Local Growth and Service Centres in the sub-area, and sets out the detailed strategy for economic development, the environment and transport; the expected outcomes are set out in the accompanying text. The South Pennine towns and villages are now proposed to accommodate 3,400 new dwellings.
192. *Queensbury* and *Thornton* are appropriately designated as sustainable Local Growth Centres in the settlement hierarchy, with good accessibility to Bradford city and with the potential to accommodate some growth, as confirmed in the latest SHLAA. The remaining settlements are designated as LSCs.
193. The lower apportionment now proposed for *Haworth* (400 dwellings; -100) is largely due to Historic England’s concerns about the potential impact that some development sites could have on the character and setting of Haworth Conservation Area. No site-specific assessments have yet been undertaken and no sites have been ruled out, but until detailed heritage impact assessments have been undertaken, it is appropriate to take a more precautionary approach towards development capacity at Haworth, particularly for potential sites which may affect the character and setting of the Conservation Area. These concerns affect only a small number of the potential sites, and the latest SHLAA confirms that sufficient suitable sites can be identified to meet the revised apportionment without using sites which might affect the Conservation Area or involve Green Belt land.
194. Much will depend on the selection and allocation of specific sites, as part of the SADPD process, but Haworth lies at the lowest tier of the settlement hierarchy and is tightly constrained by the Green Belt; there is also some uncertainty about whether the original targets can be met, and there are alternative options for the spatial distribution of development, so it is entirely appropriate to make a modest reduction to its apportionment. However, for consistency, reference to meeting local needs should be deleted from the accompanying text covering Haworth, with a similar amendment in the text covering other Pennine villages **[MM60-62]**.
195. Some participants were concerned that there may be difficulties in delivering the expected amount of development in places like *Wilsden*. However, the proposed apportionment is relatively modest, much of which can be met from existing commitments, with little use of Green Belt land; the latest SHLAA identifies much more potential land than is needed to meet the proposed apportionment.
196. Policy PN1 also sets out the strategic framework for economic development in this sub-area, supporting rural diversification, retaining existing employment opportunities, and managing tourism pressures in these rural settlements. Key environmental issues are identified, including the need to protect the integrity of the South Pennine Moors SAC/SPA, historic networks and proximity of open moorland. However, amendments are needed to reflect the changes in the approach to the South Pennine Moors SAC/SPA in amended Policy SC8, including mitigation and the loss of foraging land, as agreed with NE **[MM58]**. Criterion E4 also needs amending to cover all the key heritage assets which should be conserved and enhanced in this sub-area **[MM59]**. The Policy also identifies the key transport improvements needed, including changes to modal shift and improved public transport links.

197. Policy PN2 sets out the public and private sector investment priorities for the South Pennine Towns & Villages, in order to manage change on a scale that meets local needs for housing, employment and renewal, enhances green infrastructure, heritage assets and community facilities and improves sustainable transport. The submitted evidence confirms that there is a realistic prospect of achieving these outcomes.
198. Consequently, I conclude that the settlement hierarchy, spatial distribution of development and sub-area policies for the South Pennine Towns and Villages are appropriate, fully justified, effective and soundly based. However, to reflect the changes to the spatial distribution of development (including Haworth) Policies HO3 & PN1 need amending, for consistency and accuracy **[MM56-57; 85 & 88]**. With these and the other recommended modifications, the amended policies set out a soundly based strategic framework for the future development of the South Pennine towns and villages to guide development decisions and identify and allocate specific sites in the SADPD.
199. With the recommended modifications, the Plan sets out a clear, justified and soundly based settlement hierarchy, spatial distribution of development and strategic framework for the Sub-Areas of the Regional City of Bradford, Airedale, Wharfedale and the South Pennine Towns and Villages, which is appropriate, locally distinctive, effective, positively prepared, deliverable and consistent with national policy.

MATTER 6 – OTHER POLICIES

Key issue – Does the Plan provide a clear, effective and soundly based framework for promoting sustainable transportation, protecting, maintaining and enhancing the high quality environment within Bradford, ensuring an adequate supply of sustainable minerals and waste management, and achieving good design, which is fully justified with evidence, positively prepared and consistent with the latest national policy?

Transport and Movement

200. Section 5.2 of the Plan sets out policies to provide an efficient and effective transport system supporting the key principles of connectivity, accessibility and sustainability. It reflects the key objectives of the West Yorkshire Local Transport Plan (LTP) [PS/B001b(xxiv)] to improve connectivity in the sub-region, make substantial progress towards a low-carbon sustainable transport system and enhance the quality of life for people living and working in and visiting the area. These policies aim to reduce travel and influence travel behaviour and modal shift, as well as setting out the approach to parking, public transport, cycling and walking, transport and tourism, improving connectivity and accessibility, freight transport and aircraft safety, along with priorities for transport investment and management. CBMDC confirms that Highways England (HE) and West Yorkshire Transport/Combined Authority (WYCA) are content with the approach of these policies. The policies are also supported by a district-wide Transport Study, which aims to establish the strategic impacts of the Plan’s proposals on the highway and public transport networks, including an assessment of specific measures needed to mitigate the key impacts of such proposals [EB/039].
201. Addressing travel growth and congestion is a major issue in Bradford district, particularly given the levels of housing and jobs growth proposed. Policy TR1 aims to reduce the demand for travel and influence modal shift, setting out measures to encourage and facilitate sustainable travel modes, limit travel growth, reduce

congestion and improve journey times. It is justified by evidence in the LTP [PS/B001b(xxiii)] and reflects key priorities of the West Yorkshire Plus Transport Fund [PS/B001b(xxv-xxvi)], WYCA and the LCR Transport Strategy [PS/B001b(xxiii)]. It also reflects key factors set out in the NPPF (¶ 29-38) & PPG [ID-42/54] relating to sustainable transport, patterns of development and evidence bases. It addresses the relationship between the location of development, accessibility and travel by applying accessibility standards and requiring new developments to provide transport assessments and travel plans. The viability and deliverability of the necessary transport infrastructure, including local “pressure points”, are set out in the Local Infrastructure Plan (LIP) [EB/044; PS/M005] and have also been assessed in the Viability Assessments [EB/045-046].

202. The scale of change needed to modal shift is significant, requiring an increased proportion of trips to be made by sustainable modes; there are concerns that it will be too great and impractical, given the capacity constraints of existing public transport routes, including bus and rail transport. However, although there may be challenges in some areas, application of the accessibility standards will help to ensure that new developments are sustainable and accessible, supported by transport assessments, travel plans, corridor studies and CBMDC’s district-wide Transport Study and Cycling Strategy [EB/039; PS/B001b(xxvii)]; improvements to local train and bus services are also possible and, in the longer term, changes to bus and rail franchises can take these factors on board. More detailed transport assessments will be undertaken for the AAPs & SADPD, including updating the district-wide Transport Study, key transport corridor studies and detailed site-by-site assessment of local transport impacts [PS/M0011]. On this basis, Policy TR1 is justified, effective, deliverable, soundly based and consistent with national guidance, and needs no amendments in terms of soundness.
203. The parking standards required by Policy TR2 and set out in Appendix 4 are indicative, consistent with those of neighbouring authorities; they also reflect local circumstances and allow for flexibility, without being unduly prescriptive. However, amendments to the detailed requirements in Appendix 4 are needed to clarify the definition of *Minimal Operational Requirement*, bring the parking standards for city/town centre development in line with CBMDC’s Parking Strategy, and to reflect national guidance in the NPPF (¶ 39-40) **[MM150-151]**.
204. Policies TR3 & TR5 aim to improve accessibility to public transport, a key element of sustainable transport. The Accessibility Standards set out in Appendix 3 were developed in co-operation with the forerunner of the WYCA after detailed analysis and reflecting the LTP, without being unduly prescriptive or onerous; most potential sites already meet these standards. The approach to cycling in Policy TR3 reflects CBMDC’s Cycling Strategy [PS/B001b(xxvii)]. Tourist and leisure destinations can be large trip generators, so it is important that the traffic and transport impact of such developments are properly considered, as set out in Policy TR4; this is consistent with NPPF (¶ 32). The approach to improving connectivity and accessibility set out in Policy TR5 provides a clear and effective strategy to promote sustainable transport, with existing transport “pressure points” and congestion areas identified in CBMDC’s Transport Study [EB/039] in the context of Policy TR7. Policies TR6 & TR8 deal adequately with freight transport and aircraft safety.
205. Several participants were concerned about the traffic and transport consequences of proposed developments in the BCS, including potential road congestion and the need to strengthen local public transport services, particularly at Holme Wood and in the Airedale and Wharfedale corridors. However, CBMDC’s Transport Study

[EB/039] addresses these matters at a strategic level and further detailed work will be undertaken on assessing transport and traffic impact when new developments come forward, including along the main A65/A650 corridors, additional mitigation measures and the issue of park-and-ride facilities and capacity [PS/M011]; Travel Plans will also be required for all major developments. In some cases, there will be challenges, but further more detailed work at the appropriate time will identify the issues and the mitigation and improvements needed.

206. Consequently, with the recommended modifications [**MM150-151**], the policies for transport and movement provide a clear, effective and strategic framework for promoting sustainable transportation, which is fully justified with evidence, positively prepared, soundly based and consistent with the latest national policy.

Environment

207. Core Policy SC6 seeks to support and encourage the maintenance, enhancement and extension of Green Infrastructure (GI). It reflects work undertaken with NE, EA and the LCR authorities in establishing a Green Infrastructure Strategy, and is consistent with national policy in NPPF (¶ 69-78) & PPG [ID-37]. It will help to raise the profile of GI and ensure that more high quality GI is provided as part of new developments. However, amendments are needed to the policy wording and accompanying text to reflect the need to provide natural greenspace to assist in mitigating any adverse effects of increased recreation on the South Pennine Moors SPA/SAC, as recommended in the latest HRA update [**MM15-16**]; this will ensure that the policy is effective and addresses the concerns of NE.
208. Section 5.4 of the BCS provides a set of policies to protect, maintain and enhance the high quality environment within Bradford district. Policy EN1 sets out the approach to protecting and improving the provision of open space and recreation facilities. It is underpinned by evidence, including the Health Impact Assessment and Open Space, Sport & Recreation Study, along with more recent work on the playing pitch strategy and allotments strategy. It is consistent with the NPPF (¶ 69-78) & PPG [ID-37] and has the support of Sport England. The open space standards (Appx 9) identify broad parameters, without being unduly onerous, whilst the green infrastructure element is supported by the latest HRA in terms of the provision and retention of greenspace. However, some amendments are needed to the wording of the policy and the accompanying text to reflect the latest HRA, including references to mitigating recreational pressure on the South Pennine Moors SPA and the associated SPD, and ensure that the policy is effective and sound [**MM113-114**].
209. Policy EN2 sets out the approach to biodiversity and geodiversity, covering the North & South Pennine Moors, locally designated sites, other habitats and species, and enhancement. It is justified with evidence on biodiversity, the ecological network and protected sites, prepared in association with NE, EA and local ecological groups, and is linked to further work on Biodiversity Action Plans. It will be delivered through a variety of policies, programmes and measures, working with key organisations, and is consistent with the NPPF (¶ 109-119) & PPG [ID-8] and natural environment legislation. However, some amendments are needed to the policy criteria and the accompanying text to better align with the NPPF, address the concerns of NE and reflect the latest HRA, particularly relating to the North & South Pennine Moors SPA/SAC, SSSIs, locally designated sites, habitats and species outside designated sites and ecological networks; this will ensure that the policy is clear, effective and consistent with national policy [**MM115-120**].

210. Policy EN3 seeks to preserve, protect and enhance the character, appearance and value of Bradford’s historic environment. It is supported by evidence on the historic environment, with further work having been undertaken on Adwalton Moor registered battlefield at the request of HE. However, an amendment to the accompanying text is needed to clarify the approach to the impact of unauthorised/unsympathetic development on heritage assets at the request of HE **[MM121]**. With this change, the policy would be effective and consistent with the NPPF (¶ 126-141).
211. Policies EN4 & EN5 indicate how development proposals should make a positive contribution to the conservation, management and enhancement of the diversity of the landscapes in the district and the preservation and enhancement of trees and woodland. They are supported by specific evidence, including that produced by NE on Natural Landscape Character Areas, the adopted Landscape Character SPD and CBMDC’s Woodland Strategy. They are consistent with the NPPF (¶ 109-125) & PPG [ID-8] and require no amendments in terms of soundness; minor changes will correct the references to Esholt and Tong landscape areas.
212. Core Policy SC2 sets out the strategic approach to climate change and the use of resources. It is supported by regional and district evidence and reflects other work being undertaken at national level and by the EA and other bodies. It encompasses flood risk, water management, climate change and housing standards, and is supported by CBMDC’s Low Emission Strategy. It identifies general principles of sustainability, rather than setting specific targets, and should be flexible enough to accommodate any future changes to housing standards at national level, without being unduly onerous for developers. It broadly reflects latest national policy in the NPPF (¶ 93-99) and PPG [ID-6], and is justified, effective, deliverable and soundly based.
213. Policy EN6 seeks to encourage the provision of low-carbon and renewable energy. It is linked to the approach to climate change in Core Policy SC2 and underpinned by a 2011 regional study, which assessed the potential resource for low-carbon and renewable energy generation and identified a wide range of opportunities for such development in this district. It identifies broad principles, rather than specific targets, with the flexibility to assess viability and other delivery implications on a site-by-site basis; further work, including local requirements and targets for renewable/decentralised energy, will be undertaken in subsequent plans. Although the general approach of the policy is consistent with guidance in the NPPF (¶ 93-99) & PPG [ID-5/6], the accompanying text needs to be updated to incorporate recent national guidance and ministerial statements about wind turbine developments **[MM122-MM126]**. With these recommended modifications, the policy would be effective and up-to-date.
214. Flooding is an important issue in many parts of the district, particularly Bradford city, Shipley, Airedale and Wharfedale, including Menston and Addingham, as shown in specific evidence and during previous and recent flooding events. Policy EN7 addresses flood risk, setting out the criteria to be used when assessing development proposals; CBMDC confirms that it covers all forms of flooding, including fluvial, surface and rising groundwater flooding [PS/F060; PS/F086q]. The policy is underpinned by evidence in the Level 1 SFRA [EB/048], endorsed by EA, which provides the framework for the overall appraisal and management of flood risk, as well as allowing the identification of land with the lowest probability of flooding; a more detailed Level 2 SFRA covers areas within the AAPs.

215. There is some criticism of the Level 1 SFRA, but it provides an accurate assessment of the strategic flood risk situation using the best information available at the time. As more information becomes available, the SFRA will be updated, with more detailed flood risk assessments being undertaken at the site selection stage. CBMDC has undertaken further work on the sequential testing approach, which will be an important element in site selection in subsequent plans, and has provided further evidence on its approach to flood risk and the strategic flood risk management plans [PS/E007d; PS/F060; PS/F086q; PS/L011; PS/M010]. This confirms that, with a few exceptions in Bradford city centre and Shipley, sufficient potential housing land can be identified without using land within Flood Risk 2a and 3. The key test is that new development does not increase the risk of flooding elsewhere, although in some cases, it may help to alleviate current flooding problems. The policy also addresses the concerns about Sustainable Drainage (SuDS), the effectiveness of which will be reviewed at national level³.
216. Some participants are concerned that the policy does not specifically address groundwater flooding, particularly at Menston. However, this is a more localised problem, rather than being a matter of strategic concern. CBMDC confirms that the policy covers all forms of flooding (including groundwater flooding), and that this factor will be addressed when applying the principles of sequential testing to the selection of sites at the SADPD stage [**MM127-129**]; these amendments would also reflect the outstanding concerns of EA and other participants and address more recent amendments to the PPG [ID-7]. With these recommended amendments, the policy would fully address flood risk issues, ensuring that these matters are properly assessed at the detailed site allocations stage, aligning with the NPPF (¶ 99-104) & PPG, and be effective and sound.
217. Within Bradford district there are many areas within transport corridors and land formerly used for manufacturing, engineering and industrial processes, where issues of land, air and water quality and the impact of new development can affect the quality of life, health and amenity. Policy EN8 sets out the approach to protecting public health and the environment, addressing these specific issues. It is supported by detailed evidence on air quality, low emissions, water pollution and contaminated land, and is generally consistent with national guidance (NPPF; ¶ 120-125) & PPG [ID-6; 30-33; 45]. However, the accompanying text needs to reflect the latest HRA and issues raised by NE about air quality at designated European sites [**MM130**]. With this amendment, the policy would reflect national guidance in the NPPF & PPG, ensure that air quality issues are properly considered in terms of designated European sites, and make the policy effective and sound.
218. Consequently, with the recommended amendments [**MM15-16 & 113-130**], the BCS would provide a clear, effective and soundly based framework for protecting, maintaining and enhancing the environment within Bradford district, which is justified, positively prepared and consistent with the latest national policy.

Minerals

219. Section 5.5 of the BCS sets out policies for extracting and safeguarding minerals, including new and extended sites, sandstone, sand and gravel, fireclay, coal and other hydrocarbons, to ensure a steady and adequate supply of minerals. Mineral resources in the district are mainly suited to the production of construction materials, including building and paving stones, building sand, crushed rock aggregates and clays [PS/B001b(xxx); PS/E007e]. Cross-boundary minerals issues,

³ Housing & Planning Act 2016 (Section 171)

including the import and supply of aggregates and cut stone, have been addressed in the DTC evidence [SD/006] and in the West Yorkshire Local Aggregates Assessment (LAA) [PS/B002b].

220. Policy EN9 sets out criteria and requirements for new and extended mineral extraction sites, aiming to strike a balance between investment in new minerals development and protecting the district’s natural resources, whilst supporting sustainable minerals development which meets key environmental criteria. It is supported by accompanying evidence [PS/B001b(xxx)], reflects national policy (NPPF; ¶ 143), and takes account of previous responses made by the minerals industry, environmental bodies and NE & HE/EH. However, amendments to the policy are needed to reflect the revised HRA work about the need to address any adverse effects on the South Pennine Moors SAC/SPA or associated foraging land, including mitigation, as agreed with NE **[MM131-132]**; with these additions, the policy would be clear, effective, deliverable and soundly based.
221. Policy EN10 sets out the approach to the supply of sandstone, including the criteria and requirements for future extraction, ancillary production of aggregates at other quarries, and areas of search for future quarries. Bradford is a major consumer of aggregates, but currently has no active aggregates extraction sites and only 4 active quarries producing sandstone [PS/E007e]. However, although there is a clear commitment to maintaining a supply of sandstone and aggregates and contributing to the landbanks, there is no indication of the required scale of minerals provision over the plan period, or information on the existing situation in terms of minerals provision or landbanks.
222. The West Yorkshire LAA [PS/B002b] is the key piece of evidence underlying the policy, along with other evidence about the need for building stone [PS/B001b(xxx); PS/F048]. Figures are available for West Yorkshire (which itself largely depends on imports of crushed rock from Derbyshire and North Yorkshire), but these have not been apportioned to the constituent authorities. However, in order for the policy to be clear, effective, justified and consistent with national policy (NPPF; ¶ 143-147 & 163) & PPG [ID-27], it should provide some more detailed information about the current position on the managed supply of aggregates in terms of the scale of future provision of crushed rock aggregates in West Yorkshire and the role of Bradford, referring to the latest LAA **[MM133]**.
223. Policy EN11 sets out the approach to the supply of sand, gravel, fireclay and hydrocarbons, including criteria and requirements for future extraction of sand and gravel, clay, coal, oil and gas, and the identification of areas of search for sand and gravel extraction sites. The policy is supported by regional research and the latest LAA, and the general approach is consistent with national policy in the NPPF (¶ 145-149). Although sandstone and clay are extracted within Bradford, coal, clay and sand and gravel were an important source of construction and energy minerals in the past and may become so in the future. I also understand that both Derbyshire and North Yorkshire mineral planning authorities are aware of the cross-boundary minerals provision issues relating to both aggregates and sand and gravel as part of the DTC discussions, including the fact that West Yorkshire is not capable of meeting its own needs for many of these minerals, including concreting aggregates.
224. However, although there is a clear commitment to contribute to a 7-year sand and gravel landbank, there is no indication of the required scale of minerals provision over the plan period, or any information about the existing situation in terms of minerals provision or landbanks. As with Policy EN10, sub-regional sand and

gravel production is not apportioned to the constituent authorities and, although there are no sand and gravel reserves within Bradford district, some potentially viable sand and gravel resources may exist as river terrace deposits; there may also be longer term supply constraints, including diminishing sand and gravel imports from North Yorkshire. Consequently, further information is needed in the accompanying text about the regional/sub-regional context and scale of provision identified in the West Yorkshire LAA, the approach to maintaining the landbank required and the role of Bradford in contributing to the supply of sand and gravel [PS/F048] **[MM134]**. In addition, the policy needs to confirm that it covers both coal and hydrocarbons such as oil and gas, as well as deleting the requirement to demonstrate the quality and suitability of any coal resources to be extracted **[MM135-136]**. With these amendments, the policy would be clear, effective, deliverable, positively prepared and consistent with national policy (NPPF; ¶ 145-149 & 163) & PPG [ID-27].

225. Policy EN12 sets out the approach to minerals within the safeguarding areas for sandstone, coal and sand and gravel, in order to avoid sterilising economically significant mineral resources. This is a protective policy which is designed to ensure that due consideration is given to the prior extraction of economically significant minerals in appropriate situations, having regard to the need for housing and economic growth in the district; this is generally in line with national policy (NPPF; ¶ 143) & PPG [ID-27]. Minerals Safeguarding Areas are identified in Appendix 13 of the BCS, informed by technical information on mineral resources from the British Geological Survey [PS/B001b(xxx)], and the policy is based on consultations with the minerals industry. However, an amendment to the policy is needed to clarify the scope where sandstone safeguarding would apply in terms of ground level/engineering issues **[MM137]**, to ensure that the policy is clear, effective, deliverable and consistent with national policy.
226. Consequently, with the recommended modifications **[MM131-137]**, the policies would provide an appropriate, effective, positively prepared and deliverable approach to the supply and safeguarding of sustainable minerals in Bradford, which is justified, soundly based and consistent with national policy.

Waste Management

227. Section 5.6 of the BCS sets out concise policies for waste management, to provide the strategic planning framework to minimise the negative effects of waste generation and management, encouraging a reduced use of resources and application of the waste hierarchy, and supporting the delivery of waste management facilities as critical infrastructure to support sustainable growth. It will be supplemented by a subsequent Waste Management DPD (WMDPD). Various options for waste management were considered during the preparation of the BCS, and the DTC statement [SD/06] highlights the need to address cross-boundary movements of waste into and out of Bradford.
228. The latest national guidance on waste management [PPG: ID-28] confirms that local plans should contain evidence about the waste management capacity in the area, with an understanding of capacity gaps and forecasts of future waste management capacity to deal with forecast waste arisings. This part of the BCS is devoid of any information about waste generation, capacity and future

requirements, and so amendments are needed to the policies and accompanying text to reflect the latest national policy⁴.

229. CBMDC has therefore redrafted this section of the BCS to include information about the current and future position on waste arisings, cross-boundary issues (including the import/export of waste to and from neighbouring authorities). It also sets out the strategic framework and spatial direction for waste management (including application of the national waste hierarchy), and the policy and principles for identifying waste management sites (including the current waste management capacity and gaps, and identifying an area of search for future provision of waste management facilities) [PS/F049a/b]. This information is based on up-to-date evidence in CBMDC’s Waste Data Forecasting Model, Municipal Waste Management Strategy, Waste Needs Assessment, Capacity Gap Analysis and Requirement Study [PS/B001b(xxxi-xxxii)] and EA Waste Data information; this will be reviewed and updated in the WMDPD, which will also identify suitable new waste management sites in appropriate locations within the area of search (Appendix 7), having regard to the priorities and criteria in amended Policy WM2 and recognising the need for sustainability and proximity to the main urban areas and major settlements. Waste recycling and recovery targets are listed as indicators in the monitoring framework.
230. With these recommended additions and amendments [**MM138-146**], the BCS would provide sufficient strategic guidance and spatial direction for the subsequent Waste Management DPD, and provide a sound, effective and deliverable waste management strategy which is justified with evidence, positively prepared and consistent with the CBMDC’s own Municipal Waste Management Strategy and the latest national policy (NPPW) & PPG [ID-28].

Achieving Good Design

231. Core Policy SC9 indicates how plans, proposals and decisions should contribute to creating high quality places and effective, cohesive and sustainable settlements. It reflects the importance of good design, sense of place and local distinctiveness, set out in the NPPG (¶ 56-68) & PPG [ID-26], and provides the strategic context for Policies DS1-DS5. It is supported by national and local evidence [EB/038] and is unlikely to have any direct implications on viability. The policy itself is not specific about particular standards or requirements, but uses general indicators to ensure its effectiveness.
232. Policies DS1-DS5 set out more detailed criteria for achieving good design, working with the landscape, addressing the urban character of Bradford district, the design and layout of streets, and creating safe and inclusive places, which are directly related to Core Policy SC9 & Policy HO9. They reflect many of the key design themes in NPPF (¶ 56-68) and PPG [ID-26], and the strategic objectives of the BCS. The supporting evidence [EB/038; EB/046; PS/E007g] shows that the specific policy requirements are unlikely to have any direct impact on the economic viability of development. As drafted, they are soundly based, justified, positively prepared, effective, deliverable and consistent with the latest national policy.

⁴ National Planning Policy for Waste (2014) (NPPW), Waste Management Plan for England (2013)) and PPG [ID-28].

MATTER 7 – IMPLEMENTATION AND DELIVERY

Key issue – Are the arrangements for monitoring the policies of the Plan adequate, effective, comprehensive and soundly based?

233. Section 6 of the BCS sets out policies to support the implementation and delivery of the BCS. These cover the key planning documents which will deliver the BCS, outline the approach to considering viability and developer contributions, explain how infrastructure will be delivered, and cover simplified planning, community involvement and regeneration, along with a framework for monitoring and implementation. They are related to Core Policy SC3, which sets out how effective collaboration between CBMDC, adjoining local authorities, Town & Parish Councils and other partners and communities will take place, including the DTC and the supportive measures necessary to make great places. The general approach of Policy SC3 is positively prepared, effective and consistent with national guidance, but some clarification is needed to include other stakeholders in the list of parties and clarify the reference to climate change **[MM5-6]**.
234. The viability of new development is a key consideration, and Policy ID2 requires developers to submit viability appraisals where a variation in policy requirements or planning obligations is sought. However, the Viability Assessments [EB/045-046] fully assessed the viability implications of all the policy requirements of the BCS and highlight the current uncertainty in predicting future market conditions; they underlined the need for a flexible and pragmatic approach towards assessing viability, and recommended that viability should be tested through the development management process. Policy ID2 reflects this approach, which is broadly in line with national policy in NPPF (¶ 173-174) & PPG [ID-10], and will ensure that development is not unnecessarily delayed or prevented by onerous requirements. The policies covering developer contributions and the delivery of infrastructure are directly related to the LIP [EB/044; PS/M005] and provide an effective way of delivering the required infrastructure at the appropriate time, identifying the bodies responsible for implementation.
235. Policies ID1 & ID2 provide an appropriate, effective, comprehensive and soundly based framework to monitor the implementation and delivery of the BCS. However, some amendments to the accompanying text are needed to reflect the recommendations in the latest HRA update relating to delivering mitigation measures for impacts on the South Pennine Moors SPA/SAC and ensure that the implementation of these policies is effective **[MM147-148]**.
236. The monitoring and implementation framework provides a comprehensive basis for monitoring the implementation of the BCS, including specific indicators and targets. Each policy has its own outcomes, indicators and targets, with lead roles and delivery mechanisms, aligned to the Plan’s strategic objectives; the LIP [EB/044; PS/M005] sets out the key elements of infrastructure needed to implement the Plan, with phasing, timescales, funding, bodies responsible and delivery mechanisms. However, various amendments to the appendices of the Plan are needed, including parking standards, the housing trajectory, previously developed land scenarios and housing targets, for consistency, clarity and to reflect updates and changes to other policies in the Plan **[MM149-156]**. With the recommended amendments, this section of the Plan provides an appropriate, effective and soundly based framework for monitoring and delivering the infrastructure, which is fully justified and consistent with national policy.

Other matters

237. Other matters were raised in the representations and at the hearings which do not go to the heart of the soundness of the BCS or relate to more detailed matters about specific proposals or planning applications. In many cases, “improvements” to the Plan are suggested, particularly in terms of the clarity and coherence of the strategy and policies. In response, CBMDC proposes several minor changes to the wording of the policies and accompanying text as “Additional Modifications”, but these do not directly affect the overall soundness of the Plan and need no endorsement from me. Having considered all the other points made in the representations and at the hearing sessions, including those relating to the Proposed Main Modifications, there are no further changes needed to ensure that the Plan is sound in terms of the NPPF and associated guidance.

Overall Conclusion and Recommendation

238. The submitted Plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend that it is not adopted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

239. The Council has requested me to recommend Main Modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the attached Appendix, the Local Plan for the Bradford District Core Strategy Development Plan Document satisfies the requirements of Section 20(5) of the 2004 Act, meets the criteria for soundness in the National Planning Policy Framework, and is capable of adoption.

Stephen J Pratt

Inspector

Appendix: Main Modifications required to make the plan sound and capable of adoption

Proposed Main Modifications Composite June 2016

The following main modifications are changes that have arisen through the Examination Process and are required to ensure that a Local Plan is sound and capable of adoption. The source of the changes incorporate Main Modifications as published as well as the changes proposed following the further hearings held in May 2016

In terms of presentation, the deletion of text is denoted with a bold 'strike through' (~~strike through~~), with inserted new text as bold underlined (**new text**).

Page and paragraph numbers relate to the Publication Draft Core Strategy as submitted: Submission Document reference SD001

Section 3 Vision, Objectives and Core Policies

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through
MM1	Page 27	Objective 2	Amend objective 2, as follows: 2. To ensure that the district's needs for housing, business and commerce are met <u>in full</u> in sustainable locations that reduce the need to travel and are well served by public and services, whilst prioritising, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.
MM2	Page 31	Policy SC1 Part B5	Amend the wording as follows: '5. Support, protect and enhance the roles of the Principal Towns of Ilkley, Keighley and Bingley and the Local Growth Centres of <u>Burley in Wharfedale, Menston,</u> Queensbury, Thornton, Silsden and Steeton with Eastburn as hubs for the local economy, housing and community and social infrastructure and encourage diversification of the rural economy of the district.'
MM3	Page 31	Policy SC1 Part B6	Amend the wording as follows:

			'6. Support the Local Service Centres as defined in Policy SC4 in providing to meet local needs for homes and local services.
MM4	Page 32	Paragraph 3.20 in support of Policy SC1	Add following text at end of paragraph 3.20: <u>'Criterion B (5), refers to supporting key hubs, these comprise a series of networks or convergence of functions of the individual towns and local centres where the growth of the local economy, an increase in the supply of housing and the development of the social structure of the community are all interrelated. The various components of the settlement when considered and addressed as a whole, can lead to a more balanced and sustainable centre. These locations, through their connected activity, will provide an important focal point for services, facilities and employment and cultural activity, improving their performance, management and attractiveness.'</u>
MM5	Page 38	Policy SC3 Working Together	Amend introductory text under criterion A as follows: 'A. Effective collaboration between the Council, adjoining local planning authorities, the District's Town and Parish Councils, partners, <u>stakeholders</u> and communities within the District, Leeds City Region and beyond, particularly to.'
MM6	Page 38	Policy SC3 Working Together	Amend criterion 6, as follows '6. Achieve effective environmental management and enhancement and in order to address climate change.
MM7	Page 42	Policy SC4	Amend parts A and B of the policy relating to the Local Growth Centres: 'Local Growth Centres A. <u>Burley in Wharfedale, Menston, Queensbury, and Thornton, Steeton with Eastburn and Silsden</u> are <u>the most</u> sustainable local centres and accessible <u>to higher order settlements such as Bradford, Keighley and Ilkley.</u> to the Regional City of Bradford and Steeton with Eastburn, and Silsden, are sustainable local centres within Airedale. All are located along key <u>road and</u> public transport corridors and should therefore make a

			<p>significant contribution to meeting the districts needs for housing, employment and provide for supporting community facilities.</p> <p>B. The roles of Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton as accessible, attractive and vibrant places to live, work and invest should be enhanced.’</p>
MM8	Page 43	Policy SC4	<p>Amend the first paragraph of the ‘Local Service Centres’ section of Policy SC4 as follows:</p> <p>Local Service Centres and Rural Areas</p> <p>Within the Local Service Centres of Addingham, Baildon, Burley In Wharfedale, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Menston, Oakworth, Oxenhope, Wilsden the emphasis will be on a smaller scale of developments which meet local needs comprising both market and affordable housing together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions.</p> <p>Planning decisions and plans, strategies, investment decisions and programmes should seek to:</p> <ol style="list-style-type: none"> 1. Achieve a high standard of design that protects and enhances settlement and landscape diversity and character. 2. Support innovative means of accessing and delivering services and the reduction of isolation particularly through the development of high speed broadband access in rural areas. 3. Retain and improve local services and facilities, particularly in Local Service Centres. 4. Support economic diversification, including leisure and tourism offer, live work and home working. 5. Meet local needs for both market and affordable housing. 56. Create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation. 67. Improve public transport links between Local Service Centres and to the Regional City of Bradford, Principal Towns of Ilkley, Keighley and Bingley, the Regional City of Leeds, and the Principal Towns of Halifax and Skipton.
MM8 (continued)			
MM9	Page 44	Outcomes table for Policy SC4	Amend the outcomes table linked to Policy SC4 as follows:

			<p>Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton will have made a significant contribution to meeting the districts needs for housing, employment and associated community facilities.</p> <p>Addingham, Baildon, Burley in Wharfedale, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Menston, Oakworth, Oxenhope, Wilsden and rural areas will have seen a smaller scale of development to meet local needs.'</p>
MM10	Page 44-45	Paragraph 3.62	<p>Amend paragraph 3.62 as follows:</p> <p>Focusing development, investment and activity on the Regional City of Bradford, Shipley and Lower Baildon offers the greatest scope to: re-use land and buildings; make the most of existing infrastructure and investment; reduce greenhouse gas emissions and related impacts by reducing the need to travel; maximise accessibility between homes, services and jobs; foster wide-ranging inclusion and, encourage the use of public transport. Approximately 68% of the district's housing development is planned for the Regional City under the proposals of Policy HO3. While this reflects the fact that the Regional City is likely to see the greatest rate of increase in the need for housing, the Plan envisages that there will need to be a modest degree of dispersal of housing growth to other settlements to reflect the land supply limitations in the Regional City to ensure that growth and regeneration is also fostered in the Principal Towns and to ensure that appropriate sufficient provision of a smaller scale is made for market and affordable and local needs housing in the Local Growth and Local Service Centres.'</p>
MM11	Page 47	Paragraph 3.71	<p>Amend paragraph 3.71 as follows:</p> <p>'The Local Growth Centres within the district are, Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton, as identified on the Core Strategy Key Diagram and in the Sub Areas in section 4). They are the most sustainable local centres and vary in size and function but fulfil a significant role as settlements along key public transport corridors providing attractive and vibrant places for their surrounding areas. These centres will provide an important focal point for affordable housing and market housing needs as well as employment and associated community facilities - complementing and supporting the roles of the Regional City of Bradford, Sub Regional Town of Halifax and the Principal Towns of Skipton, Ilkley, Keighley and Bingley. This focus supports a pattern of service centres to meet the needs of rural areas and support a balanced pattern of sustainable development across the District with high quality links to Halifax, Skipton and Leeds beyond</p>

			the District boundary.'
MM12	Pages 47 & 48	Paragraphs 3.75 & 3.76	<p>Paragraphs 3.75 and 3.76 be amended as follows:</p> <p>3.75 A much slower pace and scale of growth, compared to urban areas, forms the overall approach in the settlements these parts of the district, with development being focussed on meeting local needs of Addingham, Baildon, Burley In Wharfedale, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Menston, Oakworth, Oxenhope, Wilsden. Local Service Centres are the villages that provide services and facilities that serve the needs of, and are accessible to, people living in the surrounding rural areas. Local Service Centres include a range of settlement types and sizes.</p> <p>3.76 The Plan seeks to prevent the unnecessary dispersal of development to smaller settlements and open countryside while <u>allowing for meeting local needs and appropriate</u> limited types of development in the open countryside countryside in line with NPPF.'</p>
MM13	Page 49	Paragraph 3.80	<p>Amend the paragraph as follows:</p> <p>It is a policy which should be applied both to the production of the site allocating DPD's. and also to the consideration of larger windfall proposals which have the potential to frustrate the strategic objectives of this document and or set undesirable precedents for future proposals which individually or cumulatively may do likewise.</p>
MM14	Page 49	Policy SC5	<p>Amend the second part of the policy as follows:</p> <p><u>Subject to above:</u></p> <p>B. In identifying and comparing sites for development, the Local Plan will adopt an accessibility orientated approach to ensure that development:</p> <ol style="list-style-type: none"> 1. Makes the best use of existing transport infrastructure and capacity. 2. Takes into account capacity constraints and deliverable improvements, particularly in

			<p>relation to improving and development of the Strategic Road Network including junctions and schemes identified in the spatial vision.</p> <p>3. Complies with Meets or can be mitigated in order to meet the public transport accessibility criteria set out in Appendix 3 and maximises accessibility by walking and cycling.</p> <p>4. Maximises the use of rail and water for uses generating large freight movements.</p>
MM15	Page 53	Paragraph. 3.93 (supporting text to SC6)	<p>Amend paragraph 3.93 as follows:</p> <p>‘As a strategic core policy GI provides a common thread that links other important issues in the Core Strategy; local resilience to climate change (in relation to the provision of flood water storage, sustainable drainage and urban cooling), sustainable transport and housing, tourism, health and well-being and making space for water. Particular aspects of GI have been developed in the environment theme policies relating to biodiversity, recreation and open space, heritage, design and landscape. <u>Providing high quality areas of natural greenspace on a suitable scale will assist in mitigating the adverse effects of increased recreation on the South Pennine Moors SPA/SAC.</u>’</p>
MM16	Page 53	Policy SC6 Criterion B	<p>Add new sentence to criterion B, as follows:</p> <p>B. The River Corridors of the Aire and Wharfe and the South Pennine Moors are identified as strategic Green Infrastructure assets due to the opportunities offered to enhance the living landscape as a resource for people and wildlife and to address future needs for flood alleviation, water management, carbon capture and recreation. <u>Mitigating the adverse effects of increased recreation upon the South Pennine Moors SPA/ SAC will be a priority.</u></p>
MM17	Page 57	Policy SC7 Green Belt	<p>Amended criterion B:</p> <p>B. <u>Exceptional Circumstances require</u> Green belt releases <u>required in order</u> to deliver <u>in full the</u> longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3. <u>These changes</u> will be delivered by a selective review of Green Belt boundaries</p>

			in locations that would not undermine the strategic function of green belt within the Leeds City Region and that would accord with the Core policies and the strategic patterns of development set out in Policy Policies SC5 and SC4 . The Decisions on allocations on green belt land will be assessed against the purposes of including land in green belt as set out in national guidance. The selective review will be undertaken through the Allocations DPD in consultation with local communities and stakeholders.
MM18	Page 57	Paragraph 3.102 under Policy SC7 Green Belt	<p>Amend paragraph 3.102, and split to form new paragraph 3.103, as follows:</p> <p>3.102 The general extent of the Green Belt in the District is shown on the Key Diagram. In general the Districts Green Belt has helped to achieve the aims set out in NPPF. <u>However, The Council considers, having reviewed the evidence and all reasonable alternatives, that exceptional circumstances exist which justify and require a change to the green belt. in order to meet its development needs for housing in full and in order to support long term economic success of the district. It is clear based on the land supply in the SHLAA that in order to meet the Housing requirement under policy HO1 in full would necessitate change to green belt to accommodate around 11,000 dwellings, given land supply constraints in non green belt land. This is supported by evidence in the growth study that land is available in the green belt in sustainable locations which would also not prejudice the strategic function of green belt. The evidence from the Employment Land Review suggests a limited mix of land of the right size and locations to ensure a quality offer for the plan period with only around 50 Hectares considered still suitable. To this end the plan under Policy EC3 identifies a new land supply of at least 135 hectares needs to be allocated which includes at least 84 hectares of new land currently not within the known supply. To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.</u></p> <p><u>3.103 Therefore, the</u> implementation of the Core Strategy will require, a change to the general extent of the Green Belt through the Allocations DPD in order to fully meet its development needs within the plan period to 2030 as set out in policies HO1, HO3 and EC3, as well as ensuring a green belt which lasts beyond the plan period. Based upon the current evidence of need and land supply a selective review of the green belt is required to meet the unmet needs which cannot be accommodated in non green belt areas. Localised changes to the Green Belt will be made in sustainable locations to meet identifiable development needs for which locations within the</p>

MM18 (Continued)			Regional City of Bradford, the Principal Towns, Local Growth Centres and Local Service Centres are not available. Any such changes will be considered in the context of policies SC1 – SC5, and is allowed for by policy SC7B.
MM19	Page 58	Protecting the South Pennine Moors and their zone of influence Paragraph 3.104	Amend paragraph 3.104 as follows '3.104 <u>Assessment under the Habitats Regulations is an integral part of preparing a plan and is necessary to ensure that the plan in question does not lead to adverse effects on the integrity of any European site through impacts on any species, species assemblage and/or habitats for which the European site is designated.</u> The NPPF recognises the importance of the Habitat Regulations by stating in paragraph 119 that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. The Appropriate Assessment of the Further Engagement Draft Core Strategy, required under the Habitat Regulations, assessed the potential impacts of policies and proposals in the plan on four nature conservation sites of European importance, the North and South Pennine Moors SAC and SPA.'
MM20	Page 58	Paragraph 3.105 Supporting Policy SC8 Protecting the South Pennine Moors and their zone of influence	Amend paragraph 3.105 as follows 'Potential for adverse effects on European Sites was identified via the following impact pathways: The assessment identified a range of likely significant effects that could result from the Core Strategy: <ul style="list-style-type: none"> • Loss of supporting habitats <u>(directly or indirectly)</u> • Increased emissions to air from road traffic • Collision mortality risk and/ or displacement from wind turbine developments • Recreational impacts, <u>including walkers, dogs, trampling and erosion and</u> • Urban edge effects, including fly-tipping, invasive species, wildfire and increased cat predation. '
MM21	Page 58	Paragraph 3.106	Amend paragraph 3.106 as follows

			<p><u>‘Following recommendations, data was gathered to allow further assessment of loss of supporting habitat and recreational impacts on the South Pennine Moors.</u> The distribution and magnitude of impacts differs between the four designated areas. <u>Evidence is presented in HRA Reports to indicate that, if left unmitigated,</u> impacts are likely to be of a greater magnitude in relation to South Pennine Moors sites due to their relative proximity and accessibility to development proposed within the district. ‘</p>
MM22	Page 58/59	Paragraph 3.107	<p>Delete paragraph 3.107 and renumber subsequent paragraphs:</p> <p>‘The Draft HRA Report identified a range of actions that could help to avoid or mitigate the adverse effects of the Core Strategy. It recommended adjusting the scale and spatial distribution of development in order to achieve a position where adverse impacts on the South Pennine Moors SAC and SPA were capable of being avoided, managed and mitigated. It focused attention on the combined total of new dwellings over the plan period for the settlements of Addingham, Ilkley, Burley in Wharfedale, Menston, Bingley, East Morton, Silsden, Keighley and Worth Valley, that all fall within approximately 2.5km of the South Pennine Moors SPA and SAC.’</p>
MM23	Page 59	Paragraph 3.108	<p>Amend paragraph 3.108 (and renumber) as follows:</p> <p>‘The zone lying within 2.5km of the South Pennine Moors SPA and SAC was identified in the HRA Report as the area most frequently utilised by SPA qualifying species. and where supporting high quality habitat of particular importance was to be found. To improve understanding of the use of the moorland fringe by birds of the SPA, surveys were undertaken to record bird activity. And the distribution of potentially important supporting habitats. <u>While caution needs to be applied to the baseline survey and assessment work that has been carried out to date in relation to definitively identifying areas of importance for foraging birds, it is considered to be adequate for the purposes of a strategic plan. Sites have been identified which may be of importance and further assessment can take place at the allocations stage.’</u></p>
MM24	Page 59	Paragraph 3.109	<p>Delete paragraph 3.109:</p> <p>‘The broad 2.5km zone of influence was mapped and attention focused on the extent to which this encompasses the entire outer edge of a settlement. Based on the findings</p>

			<p>of the bird and habitat surveys and on the need to achieve some reduction in the overall numbers of houses that need to be accommodated within areas of greatest sensitivity, adjustments have been made to the overall distribution of development.</p> <p>Replace with the following renumbered paragraph</p> <p><u>'The hierarchy of Habitats Regulations Assessment of plans and policies means that proposals can be subject to further and more detailed assessment when more information is available in a lower tier plan. In the context of the Bradford Core Strategy, based on the information available, sufficient flexibility over the exact location, scale or nature of development needs to be retained to enable adverse effects on site integrity, in relation to the impact pathways identified, to be avoided. The level of mitigation that could be needed, in-combination impacts and the risks associated with having limited data available need to be considered.'</u></p>
MM25	Page 59	Paragraph 3.110	<p>Delete paragraph 3.110</p> <p>While significant progress has been made in adjusting the scale and distribution of development, a strategic policy needed to be formulated that was capable of addressing outstanding adverse impacts, including elements of both avoidance and management and mitigation measures. The zone adjacent to the South Pennine Moors is evidently an area where change needs to be sensitively managed.</p> <p>Replace with the following renumbered paragraph</p> <p><u>'Appropriate assessment of the Allocations DPD will need to be able to demonstrate that, in relation to the impact pathways identified, the level of development proposed, including in-combination impacts, will not have an adverse effect on the integrity of the SPA/SAC.'</u></p>
MM26	Page 59	Paragraph 3.111	<p>Amend paragraph 3.111 (and renumber) as follows:</p> <p>'The information in the HRA Report justifies setting out a broad zone of influence policy and the identification of precautionary parameters in relation to the carrying capacity of zones around the site and avoidance and mitigation measures. The purpose of the policy set out below <u>and the overall approach</u> is to avoid potential adverse impacts on the South</p>

			Pennine Moors SPA and SAC, yet to allow development to take place in locations and on a scale where potential impacts are at such a level that there is confidence they can be avoided and managed. <u>that avoidance and mitigation measures can be effective.</u>
MM27	Page 59	Paragraph 3.112	Amend paragraph 3.112 (and renumber) as follows: ‘A wide range of policies contribute towards an overall approach of avoidance of impacts and management and mitigation measures; Strategic Core Policy 2 Climate Change and Resource Use, Strategic Core Policy 6 Green Infrastructure, Policies EN 1 and 2 relating to Open Space and Biodiversity and a number of policies in the Transport section. Where direct impact pathways were identified, such as HO3 Housing Distribution and Policy EN6 Energy then a link has been made and amendments. ’
MM28	Page 59	SC8 Protecting the South Pennine Moors and their zone of influence	Delete Policy SC8 in full and replace with comprehensively redrafted policy as follows: ‘Strategic Core Policy (SC8): Protecting the South Pennine Moors <u>SPA and the South Pennine Moors SAC</u> and their zone of influence <u>In this Policy:</u> <u>Zone A is land up to 400m from the South Pennine Moors Special Protection Area (“SPA”) and South Pennine Moors Special Area of Conservation (“SAC”) boundary;</u> <u>Zone B is land up to 2.5km from the SPA and SAC boundary; and.</u> <u>Zone C is land up to 7km from the SPA and SAC boundary.</u> <u>Subject to the derogation tests of Article 6(4) of the Habitats Directive, in all Zones development will not be permitted where it would be likely to lead, directly or indirectly, to an adverse effect (either alone or in combination with other plans or projects), which cannot be effectively mitigated, upon the integrity of the SPA or the SAC.</u>

MM28
(Continued)

			<p><u>In conducting the above assessment the following approach will apply:</u></p> <p><u>In Zone A no development involving a net increase in dwellings would be permitted unless, as an exception, the development and/or its use would not have an adverse effect upon the integrity of the SPA or SAC.</u></p> <p><u>In Zone B it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat for qualifying species of the SPA.</u></p> <p><u>In Zone C, in respect of residential developments that result in a net increase of one or more dwellings, it will be considered how recreational pressure on the SPA or SAC, that such development might cause, will be effectively mitigated. The mitigation may be:</u></p> <p>(i) <u>such that the developer elects to offer, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace and/or other appropriate measures; or</u></p> <p>(ii) <u>in the form of a financial contribution from the developer to:</u></p> <ol style="list-style-type: none"> 1. the provision of additional natural greenspace and appropriate measures to deflect pressure from moorland habitats and the long-term maintenance and management of that greenspace; 2. the implementation of access management measures, which may include further provision of wardens, in order to reduce the impact of visitors; 3. a programme of habitat management and manipulation and subsequent monitoring and review of measures. <p>To mitigate impacts on the SPA and SAC European sites due to the increase in population, an SPD will an approach will be adopted that sets out a mechanism for the calculation of the <u>financial Planning contributions, by reference to development types, the level of predicted recreational impact on the SPA or SAC, and the measures upon which such contributions will be spent.</u></p>
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MM29	Page 60	Outcomes under policy SC8	<p>Outcomes under policy SC8 be amended as follows:</p> <p>'No sites have been identified that would have direct potential adverse impacts on European Sites.</p> <p><u>Sites where mitigation would be required have been identified.'</u></p> <p>A range of management and mitigation measures and a funding mechanism have been identified that will allow <u>direct and</u> indirect impacts to be managed and mitigated.'</p>
MM30	Page 60	Indicators under Policy SC8	<p>Indicators under policy SC8 be amended, as follows:</p> <p>Area of upland fringe habitat protected and created.</p> <p><u>Further survey work has taken place and an approach to mitigation in relation to sites used for foraging by SPA qualifying bird species has been identified.</u></p> <p><u>An SPD relating to management and mitigation measures and funding has been produced and adopted.</u></p> <p>Areas of appropriate alternative natural greenspace <u>protected have been identified for protection.</u></p> <p><u>Additional</u> areas of appropriate alternative natural greenspace <u>created and maintained have been identified and created.</u></p> <p><u>A site improvement plan has been produced for the South Pennine Moors SPA/SAC by Natural England.</u></p>
MM31	Page 61	Paragraph 3.113	<p>Amend paragraph 3.113 (and renumber) as follows:</p> <p>'The detailed review of available evidence presented in the HRA Report indicates that a precautionary spatial strategy would <u>the approach should</u> in the first instance seek to restrict residential development within 400m of the SAC/SPA boundary in order to avoid the risk of urban edge effects, <u>as set out in Zone A.</u> This is because, in most cases it will not be</p>

			possible to be reasonably certain that such adverse effects could be avoided or alleviated at this distance.'
MM32	Page 61	Paragraph 3.115	<p>Amend paragraph 3.115 (and renumber) as follows:</p> <p>'In relation to Zone Bi, the review of the literature relating to the behaviour of SPA <u>qualifying / typical</u> bird species <u>and survey data</u> presented in the HRA Report, suggests that many indicates that a number of species travel as far as 2.5km from the SPA boundary to forage (and in some cases further). The area up to 2.5km from the SPA boundary is referred to as the supporting habitat management zone in the HRA Report. Within this zone, the Report recommends that new development must avoid direct (eg land take) and indirect (eg increased disturbance) impacts on supporting habitats. This has led to a re-assessment of the distribution of development within this zone in order to avoid potential adverse impacts, particularly direct land-take. It does not rule out future development, provided an adequate programme of management and mitigation measures have been identified and mechanisms set out to achieve implementation of these. Based on review of the literature, the Report recommendations and early analysis of bird and habitat survey data, a precautionary approach to carrying capacity is necessary within this zone.'</p>
MM33	Page 61	Paragraph 3.116	<p>Amend paragraph 3.116 (and renumber) as follows:</p> <p>Early analysis of bird and habitat data has led to the identification of broad areas where development should be avoided. In circumstances where a need for local green belt releases has been identified and where a proportion of land adjoining the settlement lies within the 2.5km zone, the HRA Report recommends that areas of land will need to be identified that feature neither high numbers of birds nor good quality habitats. Consideration will be given to the benefits of identifying compensatory areas of land and <u>Within Zone B, consideration needs to be given to whether land being proposed for development affects the foraging habitat of qualifying bird species, which may involve the collection and assessment of additional data.</u> Further work will seek to ensure that <u>important</u> areas regularly used by these birds can be <u>appropriately</u> protected from development and its associated impacts. <u>Taking forward an approach to identify and deliver mitigation measures, where required within this zone, will form an important element in future planning.</u> '</p>

MM34	Page 61	Paragraph 3.117	<p>Delete paragraph 3.117 and replace with the following renumbered paragraph:</p> <p><u>Increased emissions to air were identified as an impact pathway in the HRA Report. However, linking pollution loads to core strategy proposals is not straightforward and at present proposals are not sufficiently specific and data is not available to fully assess the nature of impacts. The HRA Report therefore recommended that more detailed testing and traffic modelling should be undertaken to inform work on the Allocations DPD.</u></p>
MM35	Page 61/62	Paragraph 3.118	<p>Delete paragraph 3.118 and replace with the following renumbered paragraph:</p> <p><u>Recreational impacts were identified as a key impact pathway and were subject to further investigation. Information presented in the HRA Report identified a range of issues including trampling and erosion, the effects of dogs and disturbance in relation to routes and access points.</u></p>
MM36	Page 62	Paragraph 3.119	<p>Amend paragraph 3.119 (and renumber) as follows</p> <p><u>'Zone C in policy SC8 identifies a zone of visitor influence extending up to 7km from the boundary of the South Pennine Moors SPA/SAC based on visitor survey data, using postcode of origin and point of access to the SAC/SPA. Early analysis of data from visitor survey work carried out at a range of key access points to the South Pennine Moors within Bradford District during August and September 2013 has informed the outer limit of this zone. Respondents' postcode data from the 2013 visitor surveys has been geo-referenced using OS Code Point within GIS to generate projections of average distance travelled to site and establish a picture of the zone of influence of visits to the SAC/SPA. Research carried out on distances travelled to visit European Sites for recreation in other parts of the country and supported by Natural England has indicated an average distance travelled to reach the site of between 5 and 7km. The indicative zones are shown in Appendix 14.'</u></p>
MM37	Page 62	Paragraph 3.121	<p>Amend paragraph as follows:</p> <p><u>The evidence base for the forthcoming SPD will inform the identification and delivery</u></p>

			<p><u>of opportunities for additional greenspaces, improvements to existing areas and visitor access and management measures. These will be set out in a Strategic Access Management and Monitoring (SAMM) Strategy to better manage access arrangements within the SAC/SPA, in conjunction with the provision of alternative recreational spaces, which will allow appropriate, feasible and publicly acceptable means of mitigating residual impacts to be identified.</u> An approach will be adopted that sets out a mechanism for the calculation of the planning contribution towards the most beneficial mix of the management and mitigation measures identified in the policy. Where funding needs to be pooled from a number of development proposals, consideration will be given to include such measures in the Regulation 123 List of the Community Infrastructure Levy Regulations.</p>
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Section 4 Sub Area Policies

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification																								
			New text: <u>underlined</u> Deleted text strike through																								
MM38	Page 72	Policy BD1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policies H03 and EC3, the Regional City of Bradford (including Shipley and lower Baildon) will accommodate 28,650 <u>27,750</u> dwellings and <u>approximately at least</u> 100Ha of new employment land in the period up to 2030. The broad distribution of housing development is shown as follows:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th colspan="2">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Bradford City Centre</td> <td>3,500</td> <td></td> </tr> <tr> <td>Shipley & Canal Road Corridor</td> <td>3,200</td> <td><u>3,100</u></td> </tr> <tr> <td>Shipley</td> <td>1,250</td> <td><u>750</u></td> </tr> <tr> <td>North East</td> <td>4,700</td> <td><u>4,400</u></td> </tr> <tr> <td>South East</td> <td>6,000</td> <td></td> </tr> <tr> <td>South West</td> <td>5,500</td> <td></td> </tr> <tr> <td>North West</td> <td>4,500</td> <td></td> </tr> </tbody> </table> <p>Affordable housing requirements are set out in Policy HO11.</p>		Number of residential units		Bradford City Centre	3,500		Shipley & Canal Road Corridor	3,200	<u>3,100</u>	Shipley	1,250	<u>750</u>	North East	4,700	<u>4,400</u>	South East	6,000		South West	5,500		North West	4,500	
	Number of residential units																										
Bradford City Centre	3,500																										
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South East	6,000																										
South West	5,500																										
North West	4,500																										

MM39	Page 72	Policy BD1 Criterion B (2)	Amend wording of Criterion B (2) as follows: '2. The Shipley and Canal Road Corridor will see the creation of 3,200 <u>3,100</u> new homes by 2030. New homes will be provided in a range of locations in particular the centre section. As part of the Urban Eco Settlement ambitions the Corridor will deliver sustainable buildings with innovative and contemporary architecture, Bolton Woods wildlife area and a linear park and water features linking the town centre of Shipley to the City Centre of Bradford. This will all be supported by the creation of new cycleways and footways, and improvements to Frizinghall station and new road infrastructure including Canal Road Corridor Improvements and the Shipley Eastern Link Road. Opportunities to further improve public transport will be taken wherever possible.'
MM40	Page 73	Policy BD1 Criterion C (2)	Amend text under criterion C (2,) as follows: 2. North East Bradford, will see the creation of 4,700 <u>4,400</u> new homes with associated community facilities, in particular open space and recreation facilities. The new homes will be delivered by a mix of sites but will include some local green belt changes in sustainable locations. A new <u>high quality</u> employment opportunity comprising a high quality including research and development led technology park and commercial enterprise will be located at Apperley Bridge (complemented by a new railway station and improvements to the Harrogate Road / New Line Junction). Walking and cycling networks will be enhanced including the upgrading of the canal towpath between North Bradford and Leeds.
MM41	Page 73	Policy BD1 Criterion C (4)	Amend the first sentence as follows: South West Bradford will see the creation of up to 5,500 new homes.
MM42	Page 73	Policy BD1 Part C	Add new criterion and number as C (5). with the text to be added as follows: <u>5. Shipley will see the creation of 750 new homes by 2030 together</u>

			<u>with associated community facilities and new employment opportunities. The new homes will be delivered by a mix of sites but will include some local green belt changes in sustainable locations. The location and design of development will have regard to the requirement within Policy EN3 conserve those elements which contribute to the Outstanding Universal Value of Saltaire.</u>																
MM43	Page 74	Sub Area Policy BD1, Criterion E.5	Amend criterion as follows: Conserve and enhance the area's designated and undesignated heritage assets, in particular those in the Bradford City Centre, Little Germany, Goitside and the Registered Battlefield at Adwalton moor.																
MM44	Page 82	Policy AD1 Criterion A	Amend text under criterion A, as follows: A. Strategic Pattern of Development In accordance with Policies H03 and EC3, Airedale will accommodate 8,350 8,450 dwellings in the period up to 2030 and an increase of new employment land of at least 30 Ha particularly in the digital technology sector. The broad distribution of housing development is shown as follows:- <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2" style="text-align: center;">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Keighley</td> <td style="text-align: right;">4,500</td> </tr> <tr> <td>Bingley</td> <td style="text-align: right;">1,400</td> </tr> <tr> <td>Silsden</td> <td style="text-align: right;">1,000 1,200</td> </tr> <tr> <td>Steeton with Eastburn</td> <td style="text-align: right;">700</td> </tr> <tr> <td>Baildon</td> <td style="text-align: right;">450 350</td> </tr> <tr> <td>Cottingley</td> <td style="text-align: right;">200</td> </tr> <tr> <td>East Morton</td> <td style="text-align: right;">100</td> </tr> </tbody> </table> Affordable housing requirements are set out in Policy HO11.	Number of residential units		Keighley	4,500	Bingley	1,400	Silsden	1,000 1,200	Steeton with Eastburn	700	Baildon	450 350	Cottingley	200	East Morton	100
Number of residential units																			
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MM45	Page 82	Policy AD1 Criterion B	Amend text under criterion B, fourth paragraph, as follows:																

		Silsden	Silsden will see the creation of 1,000 1,200 new homes with associated community facilities and the creation of Silsden Rural Business Park. Supporting highway infrastructure will be provided together with good walking and cycling links to Silsden and Steeton railway and bus interchange station.
MM46	Page 82	Policy AD1 Criterion B Cottingley & East Morton	Amend text under criterion B, final paragraph, as follows: Cottingley and East Morton will see a smaller scale of housing development to meet local need including some local green belt changes in sustainable locations.
MM47	Page 83	Policy AD1 Criterion B Baildon	Amend text under criterion B, sixth paragraph, as follows: Baildon will see the creation of 450 350 new homes including from sites within the area together with some local green belt changes in sustainable locations and associated community facilities.
MM48	Page 83	Policy AD1 Criterion D (2)	Amend Criterion D (2) as follows: Protect and enhance the integrity of the South Pennine Moors SPA/SAC and identify measures to support valuable upland fringe habitats, and manage access to reduce the impact of increasing visitor number. <u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.</u>
MM49	Page 84	Sub Area Policy AD1, Criterion (D 6)	Amend criterion D (6) as follows: '6. Conserve and enhance the designated and undesignated heritage assets <u>of the Airedale Corridor</u> in particular those within the boundary of the Keighley Townscape Heritage Initiative and <u>elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage in particular</u> Saltaire World Heritage Site, <u>the buildings and</u>

			<u>structures associated with the Leeds and Liverpool Canal, and the prehistoric landscapes'</u>										
MM50	Page 88	Policy AD2	<p>Add additional criterion, as follows:</p> <p><u>'G. To work with Yorkshire Water and the Environment Agency to understand fully the water and waste water infrastructure requirements needed to support growth and ensure that development proposals are aligned with investment in asset management and catchment management plans .'</u></p>										
MM51	Page 90	Policy WD1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policies H03 and EC3, Wharfedale will accommodate 1,600 <u>2,500</u> dwellings and approximately <u>at least</u> 5 Ha of new employment land in the period up to 2030. The Council will work closely with partner organisations to ensure that this development is sensitively managed to create vibrant and sustainable communities.</p> <p>The broad distribution of housing development is shown as follows:</p> <table> <thead> <tr> <th></th> <th>Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Ilkley</td> <td><u>800-1,000</u></td> </tr> <tr> <td>Burley In Wharfedale</td> <td><u>200-700</u></td> </tr> <tr> <td>Menston</td> <td><u>400-600</u></td> </tr> <tr> <td>Addingham</td> <td>200</td> </tr> </tbody> </table> <p>Affordable housing requirements are set out in Policy HO11</p> <p>Within the Principal Town of Ilkley, <u>the Local Growth Centres of Burley in Wharfedale and Menston</u> and the Local Service Centres of Addingham, Burley in Wharfedale and Menston there are opportunities for development through infill whilst retaining the character of these places.</p>		Number of residential units	Ilkley	<u>800-1,000</u>	Burley In Wharfedale	<u>200-700</u>	Menston	<u>400-600</u>	Addingham	200
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Burley In Wharfedale	<u>200-700</u>												
Menston	<u>400-600</u>												
Addingham	200												

MM52	Page 90	Policy WD1 Criterion B	<p>Amend text under criterion B, as follows:</p> <p>B. Development including new housing provision will be focused as follows:</p> <p>Ilkley will see the creation of 800 1,000 new homes focused on urban redevelopment opportunities together with a significant contribution from green belt changes in sustainable locations. Provision will be made for associated community facilities, in particular new schools as required and provision of recreation and open space to address current deficiencies.</p> <p>Addingham will see the creation of 200 new homes to meet local needs and associated community facilities.</p> <p>Burley in Wharfedale will see creation of 200 700 new homes to meet local need through redevelopment of sites within the settlement and <u>with a significant contribution from green belt changes, from some local green belt changes</u>, together with associated community facilities.</p> <p>Menston will see the creation of 400 600 new homes based on existing permissions and other opportunities within the settlement boundary <u>and from some local green belt changes</u> together with associated community facilities.</p>
MM53	Page 91	Policy WD1 Criterion D (2)	<p>Add new Criterion D (3) as follows:</p> <p><u>D(3) For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.</u></p> <p>Consequential amendment to renumber the existing criterion D(3) as D(4) and D(4) as D(5), and D(5) as D(6).</p>
MM54	Page 91	Sub Area Policy WD1, Criterion	<p>Amend Criterion D (5) (now D6 – see above) as follows:</p>

		D.5	Conserve and enhance the designated and undesignated heritage assets <u>of the Wharfe Valley especially those elements which make a significant contribution to the distinct character of this area including the distinctive Victorian and Edwardian heritage of Ilkley and the prehistoric landscapes and rock art of Rombald's Moor.</u>																				
MM55	Page 94	Paragraph 4.3.4	<p>Amend paragraph 4.3.4, as follows:</p> <p>The village of Addingham, on the edge of the Yorkshire Dales National Park, has retained its character and sense of place whilst <u>seeing a smaller scale of housing development and provision of meeting local needs for affordable housing and</u> local facilities. The village has also benefited from good bus connections to the principal town of Ilkley, the town of Silsden and neighbouring Skipton.</p>																				
MM56	Page 96	Policy PN1 Criterion A	<p>Amend text under criterion A, as follows:</p> <p>A. Strategic Pattern of Development</p> <p>In accordance with Policy H03, the South Pennine Towns and Villages will accommodate 3,500 <u>3,400</u> dwellings in the period up to 2030. The Council will work closely with partner organisations to ensure that this development creates vibrant and sustainable communities. The broad distribution of housing development is shown as follows:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: right;">Number of residential units</th> </tr> </thead> <tbody> <tr> <td>Queensbury</td> <td style="text-align: right;">1,000</td> </tr> <tr> <td>Thornton</td> <td style="text-align: right;">700</td> </tr> <tr> <td>Cullingworth</td> <td style="text-align: right;">350</td> </tr> <tr> <td>Denholme</td> <td style="text-align: right;">350</td> </tr> <tr> <td>Harden</td> <td style="text-align: right;">100</td> </tr> <tr> <td>Haworth</td> <td style="text-align: right;">500 <u>400</u></td> </tr> <tr> <td>Oakworth</td> <td style="text-align: right;">200</td> </tr> <tr> <td>Oxenhope</td> <td style="text-align: right;">100</td> </tr> <tr> <td>Wilsden</td> <td style="text-align: right;">200</td> </tr> </tbody> </table>		Number of residential units	Queensbury	1,000	Thornton	700	Cullingworth	350	Denholme	350	Harden	100	Haworth	500 <u>400</u>	Oakworth	200	Oxenhope	100	Wilsden	200
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			Affordable housing requirements are set out in Policy HO11
MM57	Page 96	Policy PN1 Criterion B	<p>Amend text under criterion B Third paragraph, as follows:</p> <p>The Local Service Centres of Cullingworth, Denholme and Haworth will between them see the creation of 1200 1100 new homes principally from sites within the existing settlement boundaries together with some local green belt changes. Provision will be made for associated community facilities in particular, health care facilities at Denholme, a community centre at Cullingworth and recreational facilities in Haworth.</p>
MM58	Page 97	Policy PN1 Criterion E (2)	<p>Amend criterion E and F to D and E respectively. Amend 'new' D (2) as follows:</p> <p>Protect the ecological integrity, the wilderness appeal and wide open skylines of the South Pennine Moors from adverse impacts, <u>and</u>, enhance the value and connectivity of upland fringe habitats. and seek to manage pressure from visitors and <u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.</u></p>
MM59	Page 97	Sub Area Policy PN1, Criterion E (4)	<p>Amend criterion E (4) (proposed now D (4)), as follows:</p> <p>'Conserve and enhance the designated and undesignated heritage assets in particular those in Haworth conservation area of the Pennine towns and villages especially those elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage; and the buildings and landscapes associated with the Brontes.</p>
MM60	Page 99	Paragraph 4.4.3	<p>Amend text as follows:</p> <p>Haworth continues to function as a widely recognised asset to the District with</p>

			its Bronte Country heritage, the Bronte Parsonage Museum and the Keighley and Worth Valley Steam Railway. The traditional economy of the town has been diversified by providing accommodation for visitors, specialist shopping and dining experience as well as a popular location for film and television productions. Housing development in Haworth has continued to cater for local demand.
MM61	Page 99	Paragraph 4.4.5	Amend text as follows: The Pennine Villages of Oakworth, Oxenhope, Harden, Wilsden, Cullingworth and Denholme have retained their individual characters and sense of place whilst <u>seeing a smaller scale of housing development and the provision of meeting local needs for housing and</u> amenities served by improved bus and rail links to Keighley town centre, Bradford city centre, Bingley, Queensbury and neighbouring Halifax.
MM62	Page 100	Policy PN2	The first paragraph of Policy PN2 is modified as follows: To manage change in the Pennine Towns and Villages on a scale that meets local needs for housing, employment and renewal, enhances green infrastructure, heritage assets, community facilities and improves sustainable means of transport Partnership working between the public and private sectors, key stakeholder bodies and local communities should focus on:

Section 5.1 Economy and Jobs

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through
MM63	Page 105	Policy EC1 paragraph 5.1.4	<p><u>Amend paragraph 5.1.4. as follows:</u></p> <p>5.1.4 In supporting Strategic Core Policy 1, the overall approach and key spatial priorities, Policy EC1 will help transform economic conditions across the District and manage and spread the benefits of economic growth as part of the wider Leeds City Region. It will enhance the role of Bradford as an important business location, with the principal towns and growth centres as hubs for the local economy. It will also help encourage diversification of the rural economy. The Policy will help support the renewal and regeneration of urban and rural areas thus contributing to the aims of Strategic Core Policy 3 – Working Together to Make Great Places together with Strategic Core Policy 4 which determines the hierarchy of settlements and their role in the economic development of the District. <u>The principal areas for future economic growth will be located in the Airedale corridor, in Bradford City Centre and the principal towns, in the M606 corridor and in the North East and South East Bradford-Leeds interface. These Economic Growth Areas will provide a range of sites for new high quality employment opportunities and commercial enterprise.</u></p>
MM64	Page 106	Policy EC1 Criterion K	<p>Amend Criterion K, as follows:</p> <p>‘K. Opportunities for business relating to the Districts unique environmental assets and challenges, including <u>extraction industries</u>, sustainable construction, renewable energy, resource and waste efficiency and environmental technologies and the ‘low carbon economy’.’</p>

MM65	Page 110	Policy EC2	Amend introductory text in Policy EC2, as follows: “The Council will support the delivery of at least 2897 1600 new jobs annually in the District in the period to 2030 through.”
MM66	Page 110	Policy EC2 - Targets	Amend target in third column of table below policy EC2 as follows: ‘Annual delivery of 2897 1600 jobs’
MM67	Page 111	Policy EC2 paragraph 5.1.14	Amend paragraph 5.1.14, as follows: ‘The 2011 Regional Econometric Model projection produced a forecast of 26,726 new jobs by the year 2028, an average of approximately 1572 jobs annually. Employment was anticipated to be driven by growth in the business, professional, finance, service and health sectors with manufacturing experiencing an overall decline. It has been calculated that this job growth equates to 146 hectares of employment land in the B Use Class across the District. However, the projections produced by the Employment Land Review and its update are based largely on trend based modelling of how the economy might perform in future years. In this respect they are not wholly complete assessments of jobs growth and related land requirement. Whilst the current economic trend indicates a growth of approximately 1352 1600 jobs per annum (excluding retail and Wholesale – REM March June 2013-2014), the theoretical actual need is potentially much greater. It is estimated that by 2030, a total of 55,298 (15.7%) of the working population will be claiming ‘Out of Work’ benefits. In order to attain full levels of employment in the District (providing jobs for everyone), the target number of jobs that would need to be created by 2030 is 4424 jobs per annum which is in reality, an unattainable aspiration. The strategy for a prosperous economy is to create the right conditions and opportunities for significant jobs growth across the District. It is not sustainable to accept the District’s high level of unemployment and economic inactivity and it is through policy EC2 an attempt is made to mitigate these circumstances. Since the number of claimants obtaining Job Seekers Allowance is estimated to reach 21,464 by 2030 and in addition, the growth in the working age population in full employment will increase by 27.800, there is a

			requirement for an average of a further 2897 new jobs annually to provide for this demand.'
MM68	Page 111	Policy EC2 Paragraph 5.1.15	<p>Insert new paragraph in support of Policy EC2 to follow existing paragraph 5.1.15 (and renumber subsequent paragraphs) as follows:</p> <p><u>The Employment Land Reviews incorporated an assessment of the deliverability and potential market demand of the employment land within the Council's employment land portfolio. This included remaining allocated employment sites from the Replacement Unitary Development Plan together with other sites which had planning backing such as an extant planning permission. The current employment land portfolio as determined at 1st April 2014 amounted to 116.03 hectares in total. This comprises of 106.68 hectares of land allocated in the Replacement Unitary Development Plan together with 9.35 hectares of land with other forms of planning backing such as planning permission. The assessment of this land indicates that, for the purposes of providing a new portfolio of employment land that will endure for the plan period and will secure opportunities for new investment and sustained economic growth, only 51.57 hectares are considered potentially suitable. Within the Bradford area, where the proposed allocation is at least 100 hectares, the current supply of potential good employment sites is 33.39 hectares, a shortfall 66.61. In Airedale, the supply is 18.18 hectares giving a shortfall of 11.82 hectares. There are no sites allocated in Wharfedale of reasonable market demand giving a requirement of 5 hectares. However, these figures will be re evaluated at Allocations stage when the details of all sites will be considered against a broad range of factors including competing demands for other land uses such as housing, infrastructure requirements, environmental impacts, and physical characteristics such as access.'</u></p>
MM69	Page 113	Policy EC3 Criterion A	<p>Amend criterion A, as follows:</p> <p>'A. The planned requirement for at least 135 hectares of employment land within the district will be distributed between the different parts of the LDF District as follows:</p>

			<ol style="list-style-type: none"> 1. 100 ha within City of Bradford 2. 30 ha in the Airedale Corridor 3. 5 ha in the Wharfedale corridor'
MM70	Page 116	Paragraph 5.1.25 new text in support of Policy EC4 Criterion D	<p>Insert new paragraph to follow existing paragraph 5.1.25 in support of Policy EC4 Criterion 4, as follows:</p> <p><u>'5.1.27 Criterion D recognises that there are key locations within the main urban areas where existing industrial and business uses predominate. It is considered that these zones provide a range of sites of varying quality and rental supply which can be of particular advantage to the development of young or lower level economic enterprises. Such concentrations of employment activity can also provide the impetus for new business innovation and growth. The traditional employment activities of these areas will continue to play an important role in providing jobs for their surrounding communities.'</u></p>
MM71	Page 116	Policy EC4 Criterion D	<p>Amend Criterion D as follows:</p> <p><u>'D. Identifying Strategic Employment Zones within the Allocations DPD and Area Action Plan DPD's</u> where development proposals for non employment uses will not be permitted unless it can be demonstrated that the proposal relates to a use which supports the function of the function of the employment zone as a predominantly industrial area.'</p>

Section 5.3 Housing

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through
MM72	Pages 154 & 155	Policy HO1 Supporting text paragraphs 5.3.11 – 5.3.14	<p>Amend paragraphs 5.3.11 – 5.3.14 and add additional new paragraphs as follows:</p> <p><u>5.3.11 Determining the scale of provision for new housing to plan for within this Core Strategy has involved two key stages. Firstly</u> in line with the NPPF, the Council has sought to undertake an objective assessment of the future need for new housing using robust and up to date evidence. <u>It has then considered whether it is feasible and appropriate to plan for this level of housing growth bearing in mind such factors as deliverability, land supply, environmental impacts and the need for a green belt review.</u></p> <p><u>5.3.12</u> The level of new housing required is difficult to assess because it is dependent on a range of complex and interdependent variables all of which have to be projected forward over the period of the plan. The Council has therefore sought independent advice on the level at which the housing requirement should be set by the commissioning of a Housing Requirement Study. The results of the Housing Requirement Study have then been incorporated into the SHMA update. The study looks at:</p> <ul style="list-style-type: none"> • Official Government projections of expected population and household growth in the district; • The sensitivity of population and household growth to variables such as levels of migration; and • The influence of projected economic and jobs growth on the number of new homes needed; and • <u>Housing market indicators and drivers.</u>
MM72 (Continued)			<p>5.3.13The population and household projections formulated by the</p>

MM72
(Continued)

Government and the Office For National Statistics are trend based and therefore highly sensitive to the trend period on which they are based. They are updated on a regular cyclical basis approximately every two years. The initial Housing Requirements Study was issued in February 2013 and was based on the then current 2008 based household projections. ~~It was then has recently been~~ supplemented by an addendum report which re-ran runs the modelling to incorporate the interim 2011 based household projections issued by the CLG in April 2013. A further report was issued in September 2014. This update was commissioned as a result of work with neighbouring authorities within the Leeds City Region aimed at deriving a consistent approach to assessing housing need. The new work updated the core demographic and economic based scenarios of the earlier reports using recently released 2011 census data, updated jobs growth projections and the newly issued 2012 based population projections.

5.3.13 ~~14~~ Full details of the Housing Requirements Study and the different iterations of the work are available on the Council's website. In line with Government guidance, in each case the work generated a baseline demographic scenario. However one of ~~but~~ the key conclusions of the work ~~is are~~ that the district is expected to see rapid and sustained population growth over the period and that the housing requirement should be aligned to a level of household growth consistent with the expected expansion in the district's economy as indicated by the Regional Econometric Model. The result is an increase or uplift in the assessment of housing need to a level well above the basic demographic scenario. ~~The rate of household formation which will occur within this growing population is more difficult to predict because it is more sensitive to changes in the economy and the housing market. The Addendum Report therefore recommended that the housing requirement be set at the mid point of a range of 1807 to 2565 dwellings per annum.~~

5.3.15 In line with the NPPG the Council has also taken account of a range of market signals in its objective assessment of housing need. It has reflected on the information and analysis contained

			<p><u>both within the Housing Requirement Study and the SHMA. The Government identifies a number potentially relevant market signals but in Bradford’s case the most significant are considered to be past rates of development and overcrowding. Past rates of development have been significantly below both planned supply and below the average rate of household growth over the period. Levels of overcrowding within parts of the urban areas are high and have worsened in recent years. The Council considers that this indicates a level of unmet need which it has addressed via the addition of a further uplift to the housing need assessment.</u></p> <p><u>5.3.16 Having determined its objective assessment of need the Council has given careful consideration to whether that need can and should be met within Bradford District. Having regard to evidence such as the SHLAA the Council considers that the level of need can be accommodated and delivered. It has also used a range of evidence including the Bradford Growth Assessment and the Sustainability Appraisal to consider the implications of planning for this level of growth. In particular it has given careful consideration to the need for and implications of green belt changes. It considers that the district’s housing needs can be met in full in a sustainable way and in accordance with the NPPF.’</u></p>
MM73	Page 157	Paragraph 5.3.14 & 5.3.15	<p>Re-number and amend paragraphs 5.3.14 and 5.3.15, as follows:</p> <p>5.3.14 17 As set out in Policy HO1 and Table HO1 there are a number of key variables which combine to produce the housing requirement for the district.</p> <p>5.3.15 18 The Housing Requirement Study’s base date is 2011 and <u>sets out its analysis of household growth and housing need up to 2030. The Core Strategy therefore indicates an the estimated annual need over from</u> that period of is taken to be 2200 dwellings in line with the report’s recommendations. The NPPF requires that the Local Plan makes provision for a period of 15 years from the expected date of adoption of the plan. Since the expected date of adoption of the Core Strategy has slipped to early 2015 the Housing Requirement</p>

			must cover the period to 2030 rather than 2028 as envisaged when the study was commissioned. The Council has therefore simply applied the study's findings for an additional 2 years.'
MM74	Page 158	Paragraph 5.3.23	<p>Delete paragraph 5.3.23 and replace with a new paragraph as follows:</p> <p>The main sources of supply to meet the housing requirement as set out within Policy HO2, in addition to those houses already completed, are now explained in more detail.</p> <p><u>The housing requirement set out within Policy HO1 has already taken account of housing completions up to April 2013. In addition to any further completions after this date on sites with a capacity of 5 or more dwellings or above 0.2ha in size, the main sources of supply to meet the housing requirement are now explained in more detail.</u></p>
MM75	Page 166	Table HO3	<p>Baseline distribution of housing requirement relating to population:</p> <p>Within Table HO3 delete the following from the Local Service Centres section and then insert the same text within the Local Growth Centres section:</p> <p>"Burley In Wharfedale 518" "Menston 362"</p> <p>Amend the first line of the Local Growth Centres section of the table as flows:</p> <p>Local Growth Centres 2,196 <u>3,076</u></p> <p>Amend the first line of the Local service Centres section of the table as follows:</p> <p>Local Service Centres 4,850 <u>3,970</u></p>
MM76	Page 167	Paragraph 5.3.56	Reflecting earlier modifications paragraph 5.3.56 and re-number. Within the paragraph the third, fourth and fifth sentences are deleted and replaced with new text as follows:

			<p>The only exceptions are Bradford City Centre and the Shipley Canal Road Corridor. Within the City Centre the housing targets to an extent reflect permissions already granted together with further ongoing viability work to suggest the levels of new homes that could reasonably be accommodated in the 2 key regeneration areas. With significant areas of the district effectively ruled out for accommodating significant additional development due to the impacts on the internationally important S Pennine Moors SAC / SPA, the only remaining alternative would be to allocate additional development to other parts of the regional city. With all urban in settlement land options utilised fully this would mean further increasing the take on green belt. The Council considers that this would be an inherently unsustainable approach when compared to the benefits of locating development within the city.</p> <p><u>The Council has also taken account of the balance in sustainability terms of locating development within the Regional City with its access to services, infrastructure and public transport compared to increasing further the levels of development in lower order settlements. The presence of environmental constraints such as possible impacts on the S Pennine Moors SAC / SPA has also been taken into account.</u> Moreover the accommodation of development within the Canal Road Corridor and the City Centre will have significant investment and regeneration benefits. The two relevant AAP's for these areas are already assessing in more detail how flood risk can be minimised or mitigated and will bring forward policies and proposals to this end. Overall it is therefore considered that the wider sustainability benefits of an approach which meets some of the housing need of the Regional City in these two areas significantly outweighs the flood risk issue.</p>
MM77	Page 168	Table HO4	<p>Within table HO4 amend the numbers and percentages as follows:</p> <p>The Regional City of Bradford 28,650 27,750 68.1% 65.9% +326 -574</p> <p>Shipley & Canal Rd Corridor 3200 3100 7.6% 7.4% +3085 +2985</p> <p>Shipley</p>

			<p>1250 750 3.0% 1.8% -235 -735</p> <p>Bradford NE 4700 4400 11.2% 10.5% -2736 -3036</p>
MM78	Page 168	Paragraph 5.3.59	<p>Amend paragraph 5.3.59 as follows:</p> <p>Overall the proposed level of growth the Regional City closely matches lies just below the suggested baseline target and represents an increased concentration in this area as compared to that within the CSFED. This has been made possible by the updated and larger land supply within the area in the updated SHLAA and by the results of the Growth Study Bradford Growth Assessment which has identified additional potential areas of search for development around the city additional to those already contained within the SHLAA. The HRA relating to the S Pennine Moors SPA / SAC has also necessitated a re-adjustment away from certain settlements and consequent increase in the Regional City.</p>
MM79	Page 168	Paragraph 5.3.60	<p>Amend paragraph 5.3.60 as follows:</p> <p>There are however significant differences between the different parts of the Regional City. Shipley, Bradford NE, SW and NW have all been assigned lower numbers than would be the case if the baseline targets were followed, largely due to land supply constraints in these areas.</p>
MM80	Page 169	Paragraph 5.3.61	<p>Amend paragraph 5.3.61 as follows:</p> <p>Conversely the Bradford SE figure lies well above the baseline target and this reflects the potential land supply in the area and the proposals for development both within and adjoining Holme Wood based upon the approved Neighbourhood Plan. It also reflects the results of the Growth Study Bradford Growth Assessment which recommended the SE area as a particular focus for growth.</p>
MM81	Page 169	Table HO5	<p>Within table HO5 amend the numbers and percentages as follows:</p>

			<p>The Principal Towns 6,700 6,900 15.9% 16.4% -30 +170</p> <p>Ilkley 800 1000 1.9% 2.4% -394 -194</p>
MM82	Page 169	Paragraph 5.3.62	<p>Amend paragraph 5.3.62 as follows:</p> <p>'The proposed overall target for the Principal Towns is also close to that indicated within the baseline distribution. However the housing target for Ilkley lies well-slightly below both the baseline target and the target proposed within the CSFED.'</p>
MM83	Page 170	Table HO6	<p>Amend the second line of the table as follows:</p> <p>Local Growth Centres 3400 4900 8.1% 11.6% +1204 +1824</p> <p>Amend the entry for Silsden as follows:</p> <p>Silsden 700 1200 1.7% 2.9% +367 +567</p> <p>Amend the entry for Thornton as follows:</p> <p>Thornton 4000 700 2.4% 1.7%</p> <p>Add the following to the table Burley In Wharfedale 700 1.7% +182 Menston 600 1.4% +238</p>
MM84	Page 170	Paragraph 5.2.63	<p>Amend the paragraph as follows:</p> <p>'The Local Growth Centres are all locations which have been promoted to the third tier of the settlement hierarchy by virtue of their status as sustainable</p>

			<p><u>local centres and their</u> role, function and accessibility to the larger settlements of such as Bradford, or Keighley <u>or to Ilkley</u>. They have a role in taking some of the development which would otherwise be allocated to either the Regional City, or to Keighley <u>or to Ilkley</u>. <u>The proposed targets for the Local Growth Centres reflect a balance between recognising their potential to accommodate some growth, the contribution that development can make to meeting housing need but also the need to reflect a number of environmental constraints. These include landscape and topography in the case of Queensbury and potential direct and indirect impacts on the South Pennine Moors SPA / SAC, and the 2.5km buffer zone around it, in the case of Silsden, Burley In Wharfedale and Menston. In the case of Queensbury, Thornton, and Steeton with Eastburn they are also assisting with the redistribution of development away from the SPA 2.5 km buffer zone. The growth assigned to Silsden has been significantly reduced as compared to the CSFED again as a result of the need to direct development away from the 2.5km buffer zone which overlaps a number of potential development sites on the eastern side of the settlement. The target for Queensbury has also been reduced since the CSFED in this case in order to reduce the need for green belt and maintain its separation from other areas and to reduce impacts on landscape and topography.</u></p>
MM85	Pages 170 -171	Table HO7	<p>Amend the second line of the table as follows:</p> <p>Local Service Centres 3350 <u>2550</u> <u>8.0%</u> <u>6.1%</u> -4504 -1419</p> <p>Delete the following from the table Burley In Wharfedale 200 0.5% 318 Menston 400 1.0% 38</p> <p>Amend the entries for Baildon and Haworth as follows:</p> <p>Baildon 450 <u>350</u> <u>1.1%</u> <u>0.8%</u> -904 -1001 Haworth 500 <u>400</u> <u>4.2%</u> <u>1.0%</u> 17 - 83</p>

MM86	Pages 171 to 172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>Policy HO3: Distribution of Housing Development</p> <p>A. In accordance with the vision and spatial principles set out in this Plan, the forthcoming Allocations, Bradford City Centre and Shipley & Canal Road DPD's will allocate sufficient land to meet the residual housing requirement of at least 42,100 for the district between April 2013 and April 2030. This requirement will be apportioned as follows:</p> <p>3,500 (8% 8.3% of the district total) within the Bradford City Centre Area AAP; 3,200 3,100 (8% 7.4% of the district total) within the Shipley & Canal Road Corridor AAP; 35,400 35,500 (84% 84.3% of the district total) within the Allocations DPD.</p>																
MM87	Pages 171-172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>B. The Apportionments between the different settlements of the district will be as follows:</p> <p>The Regional City of Bradford (28,650 27,750) Divided as follows:</p> <table data-bbox="878 911 1615 1046"> <tr> <td>Bradford City Centre</td> <td>3,500</td> <td>Bradford NE</td> <td>4,700 4,400</td> </tr> <tr> <td>Canal Road</td> <td>3,200 3,100</td> <td>Bradford SW</td> <td>5,500</td> </tr> <tr> <td>Shipley</td> <td>1,250 750</td> <td>Bradford NW</td> <td>4,500</td> </tr> <tr> <td>Bradford SE</td> <td>6,000</td> <td></td> <td></td> </tr> </table>	Bradford City Centre	3,500	Bradford NE	4,700 4,400	Canal Road	3,200 3,100	Bradford SW	5,500	Shipley	1,250 750	Bradford NW	4,500	Bradford SE	6,000		
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Bradford SE	6,000																		
MM88	Pages 171-172	Policy HO3	<p>The following modifications are made to Policy HO3:</p> <p>B. The Apportionments between the different settlements of the district will be as follows:</p> <p>The Principal Towns (6,700 6,900) Divided as follows:</p> <table data-bbox="878 1353 1451 1383"> <tr> <td>Ilkley</td> <td>800 1,000</td> <td>Bingley</td> <td>1,400</td> </tr> </table>	Ilkley	800 1,000	Bingley	1,400												
Ilkley	800 1,000	Bingley	1,400																

			<p>Keighley 4,500</p> <p>Local Growth Centres (3,400 4,900) Divided as follows:</p> <p><u>Burley in Wharfedale 700</u> <u>Menston 600</u> Queensbury 1,000 Steeton with Eastburn 700 Silsden 1,000 <u>1,200</u> Thornton 700</p> <p>Local Service Centres (3,350 2,550) Divided as follows:</p> <p>Addingham 200 East Morton 100 Baildon 450 <u>350</u> Harden 100 Burley In Wharfedale 200 Haworth 500 <u>400</u> Cottingley 200 <u>Menston 400</u> Cullingworth 350 Oakworth 200 Denholme 350 Oxenhope 100 Wilsden 200</p>
MM89	Page 173	Policy HO4	<p>Modifications are made to part B and C of the policy as follows:</p> <p>B. The plan period will be split into 2 phases with phase 1 covering the first 8 years and the second phase the final 7 years of the plan period to 2030. <u>The Allocations</u> DPD's will therefore need to allocate sufficient land to meet 8/15 of its their housing requirement as specified in Policy HO3 within the first phase <u>and 7/15 of its housing requirement within the second phase.</u></p> <p>C. Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road DPD's but will be based on the following principles:</p>
MM90	Page 173	Policy HO4	<p>Criteria 7 of Policy HO4 is amended as follows:</p> <p>7. The need to ensure an even delivery pattern within smaller settlements and rural areas where sites are aimed at meeting local and affordable housing need over the whole period of the <u>LDF Local Plan.</u></p>

MM91	Page 173	Policy HO4	<p>Additional criteria D and E are inserted as follows:</p> <p><u>D. Consideration will be given to bringing forward large or complex sites within the first phase where this would aid delivery in full in the plan period or where it would help to secure required investment and infrastructure;</u></p> <p><u>E. The Council will maintain a five year supply (plus NPPF buffer) of deliverable housing sites through considering release of the subsequent phase of sites to help address any persistent shortfall.</u></p>
MM92	Page 173 - 174		<p>Paragraph 5.3.69 is amended as follows: To reflect the changes to Policy HO4, paragraphs 5.3.69 to 5.3.73 are amended and new text added as follows:</p> <p>5.3.69 The use of a phasing policies policy within the 3-site allocating DPD's will effectively mean that some sites are held back from being developed until the second half of the plan period. It is important therefore that both details of the phasing approach and the selection of sites for the phases, as set out in the forthcoming Allocations DPD, Bradford City Centre and Shipley & Canal Road AAP's are designed to meet the housing delivery goals and targets of this document as well as those relating to co-ordinated infrastructure delivery and meeting previously developed land targets.</p> <p><u>5.3.70 The Council will ensure that Policy HO4 supports housing delivery and regeneration in a number of ways – by being selective in where the phasing policy will apply, by ensuring that that the range of criteria for the actual placement of sites within a phase are designed to be broad and supportive of maintaining housing delivery, and by emphasising the importance of maintaining a 5 year land supply of deliverable sites. It is important to stress therefore that the range of criteria for the actual placement of sites within a phase are designed to be broad and supportive of maintaining housing delivery.</u></p>

MM92
(Continued)

			<p>5.3.71 <u>Policy HO4 will therefore apply to the assessment and allocation of sites within the Allocations DPD. However within the Shipley & Canal Road Corridor and Bradford City Centre AAP's all housing allocations will be released at the start of the plan period. There are several reasons for this.</u></p> <ul style="list-style-type: none"> • <u>Firstly this will ensure that a greater supply of sites is released in the early stages of the Local Plan period thereby enhancing delivery in the areas of the district where there is the most pressing need for new homes and for regeneration;</u> • <u>Secondly it reflects the fact that the preparation of the AAP's is now at an advanced stage.</u> • <u>In the case of the Shipley and Canal Road Corridor AAP the achievement of the proposed 3,100 homes is dependent on a small number of large and complex sites all of which have been assessed as potentially benefiting from the certainty that early release would provide.</u> • <u>In the case of the City Centre AAP there is very little differentiation between sites with all being previously developed land and all being highly accessible to public transport services. The advanced nature of the work on the AAP has also given assurance that there are no significant infrastructure based reasons for a phased land release in this area. The Council also considers that in most cases these sites would have the potential to further establish and accelerate the emerging pattern of investment and regeneration in the City Centre that is now underway. The market within the City centre is changing at a rapid rate and it is considered important that the AAP takes a flexible approach which supports delivery on sites as and when proposals for development and investment arise.</u> <p>5.3.72 <u>As a result of allocation of 8/15 of the supply within phase 1 of the Allocations DPD and the allocation of all housing land within phase 1 within the two AAP's, the total land supply released at the start of the Local Plan period will amount to at least 25,533 units or 61% of supply.</u></p> <p>5.3.73 <u>With regards to the detail of the phasing policy,</u> the decision to identify two phases and to make the first phase of a longer period than</p>
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<p>MM92 (Continued)</p>			<p>the second has been taken to ensure flexibility within the land supply and support delivery. An eight year first phase will also ensure that the use of a phasing policy will not undermine the ongoing existence of a 5 year land supply of deliverable sites. Based on the LDS programme and the expectation of achieving an adopted Core Strategy by February 2015 it is envisaged that the first phase will run from February 2015 to February 2023.</p> <p>5.3.74 Within strategic planning sub areas, careful consideration will need to be given to assigning within each phase a variety of site types and site locations to meet the needs for different types, sizes and tenures of housing and this will mean that although there will be a focus on brownfield sites, some greenfield sites will need to be assigned to the first part of the plan period. The results of the SHLAA will also be used to ensure the potential timing of delivery on sites is also taken into account. The Local Infrastructure Plan will also be a key input into the phasing process. To be clear, although the Council wishes to encourage the take up and delivery of previously developed land, there will be no bar on a particular type of site being placed within the first phase.</p> <p>5.3.75 While each of the 3 DPD's which will be allocating housing sites <u>the Allocations DPD as a whole</u> will need to allocate sufficient land in the first phase to meet 8/15 of its plan wide housing requirement, it will not be a requirement <u>for each settlement to release land to precisely the same proportions. In some settlements more than 8/15 may be released within the first phase and in some slightly less. This reflects the varying circumstances to phase sites</u> on a settlement by settlement basis and the fact that –This would not be practical since some settlements will face more significant infrastructure issues while immediately deliverable land supply will also vary. <u>However unless there are sound planning reasons not to do so all settlement and sub areas should make a contribution to and release some land within phase 1.</u></p>
<p>MM92 (Continued)</p>			<p>5.3.76 <u>The Council recognises that in some cases there will be relatively long lead in times and technical issues associated with bringing forward larger or more complex sites for residential development.</u></p>

			<p><u>In such cases early release and phasing may assist infrastructure planning and the securing of funding, and will also ensure that such larger sites are capable of delivering their completions in full within the plan period. Consideration will be given to opportunities to bring such sites forward for development, as part of the first phase, where this is appropriate and consistent with the overall strategy.</u></p> <p>5.3.77 The overall principles for the phasing approach within the Local Plan are therefore set out in this document within Policy HO4. The Housing Implementation Framework included in Appendix 6 also sets out how the Council will monitor delivery and this includes the implications of under achievement of on housing completions and brownfield development targets for the phasing approach. <u>The Council will also consider the early release of phase 2 sites in the unlikely event of a persistent shortfall (defined as being over 2 successive monitoring year periods) in 5 year land supply.’ Appendix 6 also includes the expected housing delivery trajectory. This in turn reflects the Council’s approach to maintaining a 5 year land supply which includes allowing for a 20% buffer in additional supply brought forward from the later part of the plan period and resolving the backlog in previous provision over the full plan period (the ‘Liverpool approach’). This reflects the need to boost delivery to meet the backlog but at a rate which would be practicable and deliverable.</u></p> <p>5.3.78 <u>Finally, to be clear, Policy HO4 is aimed at the process of allocating and phasing the release of sites in a managed and sustainable way in the subsequent Allocations DPD. It is not the intention that Policy HO4 be applied to prevent other future sustainable housing development proposals (which would be considered windfall development) from coming forward.</u></p>
MM93	Page 175	Policy HO5 Paragraph 5.3.77	<p>Amend paragraph 5.3.77 as follows:</p> <p>The Government’s NPPF therefore recognises that it is a legitimate role of the local plan to set density targets which reflect local circumstances. The local</p>

			<p>circumstances which warrant such targets in this plan include the massive scale of development which is needed to meet the district's growing population and the relatively constrained supply of deliverable land to meet that need, particularly within the main urban areas.</p> <p>In this context and in having regard to the need to promote urban regeneration and avoid the dispersal of development and increased journeys by car, the Council considers that all most developments should achieve a minimum density of 30 dwellings per hectare.</p>
MM94	Page 175	Policy HO5	<p>Make the following minor amendment to criteria C</p> <p>C. Detailed density targets applying to specific sub areas will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road Corridor DPD's. This will include those areas where local character of the area would warrant lower densities or areas well served by public transport where higher densities may be required.</p>
MM95	Page 177	Paragraph 5.3.81	<p>After paragraph 5.3.81 add a new paragraph as follows:</p> <p><u>For the purposes of clarity, the targets set out within Policy HO5 relate to net densities. Net density is usually determined by measuring the number of dwellings against the net developable area of the site. The net developable area would include only those site areas which will be developed for housing and directly associated uses, including local access roads within the site, private garden space, car parking areas, incidental open space and children's play areas, where these are provided.</u></p>
MM96	178	Policy HO6	<p>Amend Policy HO6 as follows:</p> <p>'A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the plans, programmes and strategies of the Council will give priority to the development of previously developed land and buildings.</p>

			<p>This will mean achieving the maximum possible overall proportion of housing development on previously developed land consistent with:</p> <ol style="list-style-type: none"> 1. the deliverable and developable land supply; 2. the need to maintain a 5 year land supply of deliverable sites; 3. the need to coordinate development with infrastructure provision; and 4. the need to maintain delivery of the scale and type of homes required throughout the plan period; <p>B. District wide, a minimum of 50% of total new housing development over the Local Plan period will be on previously developed land.</p> <p>C. In order to achieve the district wide target of 50%, the Allocations, Bradford City Centre and Shipley and Canal Road DPD's should bring forward land and manage its release so as to deliver at least the following proportions of housing development on previously developed land:</p> <ul style="list-style-type: none"> • In the Regional City of Bradford a minimum of 55% • In the Principal Towns a minimum of 50% • In the Local Growth Centres a minimum of 15% • In the Local Service Centres a minimum of 35% <p>D. The Council will monitor performance against these targets and will take action if performance slips outside of the defined acceptable ranges as set out in the housing implementation framework.'</p>
MM97	Page 177	Paragraph 5.3.84	<p>Amend paragraph 5.3.84 , as follows:</p> <p>'Policy HO6, together with the implementation strategy included in Appendix 6 therefore sets out the priority that the Council will give to maximising the contribution which previously developed land makes to the provision of new homes, and indicates minimum targets for the proportion of housing completions which should be on previously developed land which reflects the evidence base, in particular the SHLAA. The policy therefore supports both the Core Strategy's place specific vision for Bradford and strategic objective 2.'</p>
MM98	Page 179	Paragraph 5.3.88	Amend paragraph 5.3.88, as follows:

			<p>' The district wide target of 50% of new housing on brownfield land is a realistic one based on the land supply data within the SHLAA. The targets <u>though challenging are considered achievable. have also been expressed as minima as the Council believes that there may be limited scope to further increase the proportion of brownfield delivery. For example</u> The SHLAA has taken a cautious view of development potential within the City Centre and there are a range of schemes not currently within the trajectory which may well come forward once the economy recovers albeit at lower densities than was the case when permissions were originally granted. Further brownfield supply may also materialise via the recycling of land in the urban areas, particularly within the Bradford and Keighley, and as a result of recent Government changes to allow the conversion of offices to residential use.'</p>
MM99	Page 186	Policy HO8 Paragraph 5.3.116.	<p>Amend paragraph 5.3.116. as follows:</p> <p>'When an appropriate mix of housing on site is being negotiated, decisions should take account of local market demand, the balance between general market supply and demand and evidence of local need to ensure the site contributes to the overall mix of housing in the locality. <u>The viability of achieving an appropriate housing mix should also be considered.</u> The SHMA, and any more detailed and localised evidence of housing need and demand, such as local or village needs surveys, will form the main basis on which the creation of an appropriate and sustainable mix of house types within larger sites will be judged both at the level of plan making and in considering planning applications.'</p>
MM100 (Continued)	Page 189	Policy HO9	<p>Amend Policy HO9 as follows:</p> <p>'A. New housing development should be high quality and achieve good design.</p> <p>B. The Council will encourage <u>and support all</u>-new <u>housing residential</u> developments to <u>meet achieve the highest possible</u> sustainable design and construction standards. <u>Subject to feasibility and / or viability,</u> The minimum acceptable <u>sustainable housing</u> standards <u>are set out in the building regulations with reference to the Code For Sustainable Homes or any national equivalent will be:</u></p>

			<ul style="list-style-type: none"> • Code Level 4 from the date of adoption, and • Zero Carbon Housing (or any national equivalent) from 1st April 2016 <p>C. <u>Larger housing sites should include a proportion of</u> new homes <u>which are should be</u> designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including <u>older people</u> and people with disabilities.</p> <p>D. New development should provide private outdoor space for homes, unless site constraints make this clearly unfeasible and/or unviable.</p> <p>E. New homes should be well laid out internally and should provide suitable space standards appropriate to the type of home. Rooms should receive adequate levels of daylight.</p> <p>F. New development should provide adequate storage for bins, recycling and cycles. These should be located or designed in a way which is both convenient for residents and supports the quality of the street scene.</p> <p>G. Specific guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so.'</p>
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MM101	Page 190	Policy HO9	<p>Amend targets table in support of policy HO9, as follows:</p> <table border="1" data-bbox="882 188 1610 1189"> <thead> <tr> <th data-bbox="882 188 1131 236">OUTCOMES</th> <th data-bbox="1131 188 1417 236">INDICATORS</th> <th data-bbox="1417 188 1610 236">TARGETS</th> </tr> </thead> <tbody> <tr> <td data-bbox="882 236 1131 406">Housing that is high quality and achieves good design</td> <td data-bbox="1131 236 1417 406">% of major housing schemes achieving no reds in Building for Life 12 Assessments</td> <td data-bbox="1417 236 1610 406">No planning permissions for a major housing scheme should achieve a 'red' rating against Building for Life 12 assessment</td> </tr> <tr> <td data-bbox="882 406 1131 678">Housing that meets high standards of environmental performance as set out by Government</td> <td data-bbox="1131 406 1417 678">% of new dwellings achieving Code Level 4 Operational</td> <td data-bbox="1417 406 1610 678"></td> </tr> <tr> <td data-bbox="882 678 1131 1117">Housing that is accessible and easily adaptable which caters for the needs of the district's growing population</td> <td data-bbox="1131 678 1417 1117">% of new dwellings achieving Lifetime Homes Standard or any national equivalent <u>optional technical standards for accessible and adaptable dwellings and wheelchair user dwellings</u> Operational</td> <td data-bbox="1417 678 1610 1117"></td> </tr> <tr> <td data-bbox="882 1117 1131 1189"></td> <td data-bbox="1131 1117 1417 1189"></td> <td data-bbox="1417 1117 1610 1189"></td> </tr> </tbody> </table>	OUTCOMES	INDICATORS	TARGETS	Housing that is high quality and achieves good design	% of major housing schemes achieving no reds in Building for Life 12 Assessments	No planning permissions for a major housing scheme should achieve a 'red' rating against Building for Life 12 assessment	Housing that meets high standards of environmental performance as set out by Government	% of new dwellings achieving Code Level 4 Operational		Housing that is accessible and easily adaptable which caters for the needs of the district's growing population	% of new dwellings achieving Lifetime Homes Standard or any national equivalent <u>optional technical standards for accessible and adaptable dwellings and wheelchair user dwellings</u> Operational				
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MM102	Page 191	Paragraph 5.3.138	<p>Amend paragraph 5.3.138 as follows:</p> <p>'Under Criterion B the council will encourage developers to bring forward proposals which meet the highest possible standards of sustainable <u>design and</u> construction, <u>which should meet at least</u> All new development should</p>															

			<p>attain a high standard of sustainable construction in line with the prescribed national standards at the time of application. <u>New housing should achieve the zero carbon housing standard (or any national equivalent) in line with the timescales set out in the national zero carbon housing policy.</u> The council will encourage and support developments which exceed the national minimum standards. All new housing developments of 10 or more dwellings will be expected to meet the Code for Sustainable Homes Level 4, and from 1st April 2016 all new housing must meet the Zero Carbon Homes standard or any national equivalent. If the proposed standards are below those set out in Policy HO9 then the onus will be on applicant to justify why development to these standards cannot be achieved.</p>
MM103	Page 191	Paragraph 5.3.139	<p>Amend paragraph 5.3.139 as follows:</p> <p>‘This requirement will be assessed through evidence provided by the applicant that the scheme will achieve the standards set out in the policy (or any subsequent revised national standards). The evidence submitted by the applicant should enable easy assessment and applicants are encouraged to undertake a Design Stage Assessment of performance against the Code for Sustainable Homes. A post construction stage certificate confirming that the development has met the required standard will be required prior to occupation. The council will encourage and support developments which exceed the national minimum sustainable housing standards, particularly efficiency standards. The council will also support the use of on site renewable or low carbon energy generation, where appropriate and feasible, to help meet the energy requirements of the development and reduce carbon emissions.’</p>
MM104	Page 191	Paragraph 5.3.140	<p>Amend paragraph 5.3.140 as follows:</p> <p>‘Under Criterion C <u>The council will encourage and support all new homes should be which are designed to provide enhanced accessibility or adaptability designed to be accessible and easily adaptable. This includes accessible and adaptable dwellings and wheelchair user dwellings, as set out in the national optional technical standards for</u></p>

			housing. Where feasible and viable the council will encourage new housing to achieve In addition the council will support the Lifetime Homes Standard <u>as a model for building accessible and adaptable homes.</u>
MM105	Page 191	Paragraphs 5.3.141. & 5.3.142	<p>Amend paragraph 5.3.141 as follows:</p> <p>‘ Under Criteria C larger sites of 10 dwellings or more will be expected to <u>should</u> include a proportion of accessible homes as part of the overall housing mix. This will be assessed through evidence provided by the applicant that <u>a proportion of new homes on a site housing will achieves Lifetime Homes standards, the British Standards for Accessible Housing or any subsequent revised exceed the</u> national <u>minimum requirement for access. accessible housing standard.</u> If these standards are not met, this should be clearly justified and the applicant should demonstrate how the development meets the requirements of Criterion C. <u>In considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site. Site specific factors such as vulnerability to flooding, the topography of the site or other circumstances which may make a site less suitable for accessible dwellings will also be taken into account, particularly where step free access cannot be achieved or is not viable.</u></p> <p>Insert new paragraph to follow:</p> <p><u>The council intends to undertake further detailed work in regards to the requirement for accessible, adaptable and wheelchair user dwellings in accordance with the latest National Planning Practice Guidance. The Housing Design Guide will take account of this work and provide further guidance in relation to the proportion of accessible, adaptable and wheelchair user dwellings required in advance of any adopted policy in the Local Plan.</u></p>
MM106	191	Paragraph 5.3.143	<p>Before paragraph 5.3.143 insert new paragraph as follows:</p> <p><u>5.3.144. The provision of sufficient living space within new homes is an important element of good housing design. Building to suitable space</u></p>

			<p><u>standards will ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances.</u></p> <p>Amend paragraph 5.3.143, as follows:</p> <p><u>'Under Criterion E new homes should provide suitable space standards encourages suitable space standards which will ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances. Subject to viability and /or feasibility the council will expect all new housing to meet at least the following minimum internal floor areas (or any subsequent national space standards) as follows:</u></p> <p><u>1 Bed / 2 person dwellings 51 m2</u> <u>n 2 Bed / 3 person dwellings 66m2</u> <u>n 2 Bed / 4 person dwellings 77 m2</u> <u>n 3 Bed / 5 person dwellings 93 m2</u> <u>n 4 Bed / 6 person dwellings 106 m2</u> <u>(Floor areas shall be measured in line with RICS Gross Internal Floor Area)</u></p>
MM107	192	Paragraphs 5.3.144	<p>Insert new paragraphs after paragraph 5.3.143, as follows:</p> <p><u>' The Government has developed a national space standard to offer a consistent set of requirements with regard to the size of new homes. The overall objective of this national space standard is to ensure that new homes are highly functional in terms of meeting typical day to day needs at a given level of occupation. The standard is intended to be a minimum standard which developers should exceed where possible.</u></p> <p><u>For residential developments the council will apply the national space standard as a benchmark for assessing the suitability of the proposed space standards of new homes. This will allow particularly small homes to be identified, and where necessary, the council will seek to understand the reasons for any significant variation from the national space standard.</u></p>

			<p><u>Where feasible and / or viable new homes should meet at least the minimum internal floor areas as set out in the Nationally Described Space Standard (or any subsequent national space standards) ‘</u></p> <p>Amend Paragraph 5.3.144 as follows:</p> <p>‘If the proposed space standards are below those set out <u>in the nationally described space standard</u> above then the onus will be on applicant to justify why development to these standards cannot be achieved.’</p> <p>Insert new paragraph to follow:</p> <p><u>‘The council intend to undertake further detailed work in regards to adopting the national space standard in the District, in accordance with the latest National Planning Practice Guidance, in advance of any policy requirement in the Local Plan.’</u></p>
MM108	Pages 196 to 197	Policy HO11	<p>Amend criterion C under Policy HO11 as follows:</p> <p>‘C. Affordable housing will be required on sites-developments of 15 dwelling units or more and on sites over 0.4 hectares in size. The site size threshold is lowered to <u>11 5 dwelling units or more</u> in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley.</p>
MM109	Page 198	Paragraphs 5.3.173 & 5.3.174	<p>Amend paragraph 5.3.173 as follows:</p> <p>The council will seek affordable housing from residential developments in accordance with the stated thresholds and percentages as set out in Policy HO11. Figure HO2 shows the areas that the policy and the thresholds will apply to. This equates the following quotas:</p> <ul style="list-style-type: none"> • Wharfedale up to 30% • Towns, suburbs and villages up to 20% • Inner Bradford and Keighley up to 15%

			<p><u>Within Wharfedale and the villages listed in Part C of Policy HO11 affordable housing contributions will be required on developments of 11 units or more or which have a maximum combined gross floorspace of more than 1000sqm, in accordance with the minimum threshold for affordable housing contributions as set out in the National Planning Practice Guidance.</u></p> <p>Amend paragraph 5.3.174 as follows:</p> <p>5.3.174. Irrespective of the thresholds, Policy HO11 will be applied to developments which have been manipulated in size (either in area or yield) in an attempt to avoid the provision of affordable housing, or which constitute piecemeal development. On smaller sites a commuted sum may be appropriate where this is justified by viability issues.</p>
MM110 MM110 (Continued)	Pages 200-202	Paragraphs 5.3.179 to 5.3.189	<p>Amend paragraphs 5.3.179 to 5.3.189 as follows:</p> <p>Gypsies, Travellers and Travelling Showpeople</p> <p>5.3.179 It is clearly established within the recently issued national Government guidance <u>contained within ‘Planning policy for traveller sites’</u> that the planning system has a crucial role and responsibility to ensure that adequate provision is made for the accommodation needs of travellers. Local planning authorities are required to set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area.</p> <p>5.3.180 The Core Strategy therefore assesses both current supply and future need for accommodation by reference to the <u>recently completed Gypsy and Traveller Accommodation Assessment of July 2015, 2008 West Yorkshire Gypsy and Traveller Accommodation Assessment</u> and provides a framework to ensure that the sites which will be identified in forthcoming DPD’s meet <u>in full</u> the needs of the community and are in locations which are accessible to key services and facilities such as education thereby enhancing their quality of life.</p>

MM110
(Continued)

~~5.3.181 The Council are currently in the process of commissioning an update to the Accommodation Assessment for Bradford and its conclusions where relevant will be used to update Policy HO12 below.~~

5.3.181 5.3.182 The Bradford Gypsy and Traveller Accommodation Assessment, West Yorkshire Accommodation Assessment, commissioned by the West Yorkshire Housing Partnership, was completed by consultants arc4, has utilised a variety of CRESR (the Centre for Regional Economic and Social Research at Sheffield University) in May 2008. The study is compliant with Government guidance on such studies and used both primary and secondary data and research to assess the scale and type of need including current unmet need, need from households who currently reside in bricks and mortar accommodation, and need resulting from future household growth which is linked to the age structure of current households and finally need for transit accommodation.

5.3.182 Based on the results of the Assessment it appears that there will be a need for a range of site types, tenures and locations including both private and public / social provided accommodation. The Council will therefore work closely with local communities in developing the site allocating elements of the Local Plan to ensure that sites and locations are both sustainable and best meet the needs of travellers and showpersons.

5.3.183 Government policy states that Local Planning Authorities should assess the need for transit site accommodation in addition to permanent accommodation. Such provision can support the community's lifestyle by providing temporary places to stop while travelling. Utilising data from past patterns of unauthorised encampments and information from stakeholder and household survey returns, the Gypsy and Traveller Accommodation Assessment has identified the need for 7 transit pitches with total capacity for 14 vehicles / homes. There are a number of models and options for providing for such transit need including that of Negotiated Stopping which is currently used in other parts of the region such as Leeds. The Council will work with local communities and neighbouring authorities to determine the best model and best locations

MM110
(Continued)

<p><u>for transit provision.</u></p>	<p>5.3.183 The study found that there was already a level of unmet need for accommodation across the sub region with consequent detrimental effects on access to key services. For example, just 41 per cent of Traveller children on the roadside attend school regularly compared to 80 per cent of those on sites and in bricks and mortar housing. While the size of the population has increased the level of authorised provision has not kept pace with this change. This has resulted in a myriad of responses – including rising unauthorised encampments, ‘doubling up’ on sites, forced movements into bricks and mortar housing and overcrowding within trailers and caravans. New provision is therefore essential to address the backlog of unmet need and also meet the needs of new forming households and an expanding population.</p> <p>5.3.184 Specifically regarding gypsy and traveller accommodation West Yorkshire has a much higher proportion of socially rented provision (81 per cent) compared to the regional (53 per cent) and national (40 per cent) pictures and contains only a small proportion of private provision (4%).</p> <p>5.3.185 By contrast Travelling Showpeople do not tend to reside on local authority sites. Indeed, virtually all of those households in the survey were resident on Showmen’s yards leased to, or owned by, the Showmen’s Guild or Guild members. Travelling Showpeople also differ from other travelling groups in the sense that their accommodation needs are heavily influenced by their employment practices. They need larger spaces for the storage of heavy machinery and equipment and often need to carry out testing, repairs and maintenance to equipment within their yards.</p> <p>5.3.186 The Assessment found that there was already an acute shortage of accommodation for the travelling showpeople community and stated that the accommodation that did exist was generally of poor quality.</p> <p>5.3.187 In addition to specifying the number of pitches which are required the Assessment also makes a number of important points which are relevant to the type of provision and mechanisms for delivery within the District. Firstly based on need generated by patterns of unauthorised</p>
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MM110
(Continued)

~~encampments the study concludes that there is a sub-regional requirement for 19 transit pitches. However there was a lack of support towards the idea of transit sites from both stakeholders and the community with concerns related to the management of such sites. The study suggests that a pragmatic approach to accommodating transient households appears more appropriate. This could include short-term pitches on residential sites, the use of appropriate stopping places and short-term ‘doubling up’ on the pitch of a relative.~~

~~5.3.188 Secondly with regards to the ability of communities to make their own provision for sites and facilities there were differing results. Around 45% of Travelling Showpeople who responded to the study questionnaire had some experience of purchasing or pooling land compared to only 6% for other communities. The report suggests that levels of deprivation are higher among gypsy and Irish traveller groups – for these groups the purchase of land is simply not an option. The clear implication is that the local authority and other social housing providers will need to provide or facilitate the majority of accommodation needed for the gypsy and traveller community.~~

~~5.3.184 5.3.189 Table HO8 sets out the requirement for accommodation in the district based on the results of the study Assessment. The study compares current and planned supply with current unmet need and future need which will result from the growth in households. Similar methodologies were used for assessing the needs of both Travelling Showpeople and Gypsies and Travellers. As the study only covered the period to 2026 Policy HO12 adds further pitches on a pro-rata basis equivalent to the 2016-26 rates of the study.~~

Table HO8: Pitch and Plot Requirements In Bradford District based on the Bradford Gypsy & Traveller West Yorkshire Accommodation Assessment 2015 2008

Delete existing table HO8 and replace with the following table:

<u>Gypsy's and Travellers</u>	<u>Need (2014-19)</u>	<u>82 Pitches</u>
	<u>Supply of</u>	<u>52 pitches</u>

MM110 (Continued)			<u>authorised pitches</u>		
			<u>Shortfall / additional supply needed 2014-19</u>	<u>30 pitches</u>	
			<u>Longer Term Need (to 2030)</u>	<u>9 Pitches</u>	
			<u>Total Additional Supply Needed</u>	<u>39 pitches</u>	
			<u>Transit Provision</u>	<u>Total Additional Supply Needed</u>	<u>7 pitches</u>
			<u>Showpersons</u>	<u>Need (2014-19)</u>	<u>68 plots</u>
				<u>Supply of authorised plots</u>	<u>36 plots</u>
				<u>Shortfall / additional supply needed 2014-19</u>	<u>32 plots</u>
				<u>Longer Term Need (to 2030)</u>	<u>13 plots</u>
				<u>Total Additional Supply Needed</u>	<u>45 plots</u>
MM111	Pages 202-203	Policy HO12	<p>Amend Policy HO12 as follows:</p> <p>Policy HO12: Sites For Travellers and Travelling Showpeople</p> <p>A. The Council will make provision via policies and site allocations to deliver <u>at least</u> the following number of additional pitches for Gypsies and Travellers <u>and plots</u> for Travelling Showpeople for the period <u>to 2030</u> 2008-30:</p> <ul style="list-style-type: none"> • <u>39</u> 74 pitches for the gypsy and traveller communities; and • <u>7 pitches for transit accommodation</u> • <u>45</u> 22 pitches for travelling showpeople <p>B. The Allocations DPD and Shipley & Canal Road AAP will <u>in combination</u></p>		

			<p>allocate identify sufficient sites to deliver this requirement in sustainable and accessible locations which meet the needs of local communities;</p> <p><u>C. The Council will work closely and constructively with the neighbouring councils, the traveller and showperson’s communities and the settled community to identify the most appropriate sites which will offer locations and accommodation which are both sustainable and meet the needs of the travellers and showpeople;</u></p> <p><u>D</u> C. All sites which are developed or proposed for allocation for the gypsy and traveller and travelling showpeople communities should be assessed against criteria relating to:</p> <ul style="list-style-type: none"> • Safe and appropriate access to the highway network; • Whether they are or can be served by utilities or infrastructure; • Whether they are accessible to services, amenities and public transport; • The avoidance of significant adverse affects on the environment and adjacent land uses; and • Incorporating appropriate design and landscaping standards. • Avoiding areas at high risk of flooding; <p>D. Temporary planning permission may be granted for sites where they would help meet local need ahead of the development of permanent sites and where they would accord with the criteria above.</p> <p>E. Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.</p> <p>F. The criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the Allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the green belt.</p>			
MM112	Page 203-204	Table of outcomes, lead roles and	<p>Amend the paragraphs as follows:</p> <table border="1" data-bbox="880 1361 1644 1398"> <thead> <tr> <th data-bbox="880 1361 1137 1398">OUTCOMES</th> <th data-bbox="1137 1361 1395 1398">INDICATORS</th> <th data-bbox="1395 1361 1644 1398">TARGETS</th> </tr> </thead> </table>	OUTCOMES	INDICATORS	TARGETS
OUTCOMES	INDICATORS	TARGETS				

MM112 (Continued)	paragraphs 5.3.90 and 5.3.91	<p>Sufficient new accommodation for Gypsies and Travellers and Travelling Showpeople of the right size, type and tenure has been provided to meet the needs of local communities as set out in the <u>Bradford Gypsy and Traveller Accommodation Assessment West Yorkshire Accommodation Assessment.</u></p>	<p>The land supply of sites for Travellers and Travelling Showpeople IND7(H)</p> <p>Annual gross pitch completions – district wide split between G&T pitches and pitches for Travelling Showpeople Operational</p>	<p>A deliverable five year land supply of sites for Travellers and Travelling Showpeople</p>		
		<table border="1"> <thead> <tr> <th>LEAD ROLES</th> <th>DELIVERY MECHANISMS</th> </tr> </thead> <tbody> <tr> <td> <p>CBMDC Developers – market housing InCommunities Other RSL's – social housing HCA Government <u>Local Community Groups including Leeds GATE</u></p> </td> <td> <p>Strategic Policy via Core Strategy Local policy and allocations Householder SPD Development Management Decisions Gypsy & traveller Accommodation Assessment SHMA</p> </td> </tr> </tbody> </table>	LEAD ROLES	DELIVERY MECHANISMS	<p>CBMDC Developers – market housing InCommunities Other RSL's – social housing HCA Government <u>Local Community Groups including Leeds GATE</u></p>	<p>Strategic Policy via Core Strategy Local policy and allocations Householder SPD Development Management Decisions Gypsy & traveller Accommodation Assessment SHMA</p>
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			<table border="1"> <tr> <td>AMR</td> </tr> </table> <p>5.3.185 5.3.190 The policy as proposed gives sufficient guidance to other site specific Local Plan documents and could be easily updated should new or updated evidence on accommodation needs be produced in the future. By identifying criteria which could be equally applied to applications for planning permission as for the Local Plan site selection and allocation process, the preferred policy would enable the Council to respond to any proposals for site developments which might come forward in the short term.</p> <p>5.3.186 5.3.194 The policy allows for the inclusion within the Local Plan, should the evidence justify it, of rural exception sites and policies.</p>	AMR
AMR				

Section 5.4 Environment

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through
MM113	Page 210	Policy EN1 Paragraph 5.3.17	Amend paragraph as follows: Data has been collected from surveys about visits to areas of the South Pennine Moors that lie within Bradford. The visitor data relates to key factors such as frequency of visit, timing, access point, range of activities, mode of transport and distance travelled. Once this has been fully analysed, it will help to assess how potential impacts from an increasing number of visitors can be managed and the extent to which alternative areas of natural greenspace can divert pressure to less sensitive areas. <u>An SPD will be produced to identify contributions and secure mitigation measures, in relation to provision of natural greenspace, where this is required to mitigate the effects of increased recreation pressure upon the South Pennine Moors SPA/SAC</u>
MM114	Page 211	Amend text to policy EN1 Add section between section headed: Provision of Open Space and Recreation Facilities and Local Greenspace.	Add new criterion, as follows: <u>Mitigating Recreational Pressure on the South Pennine Moors SPA and SAC</u> <u>C. Residential developments which contribute to recreational pressure upon the South Pennine Moors SPA and SAC will be required to mitigate these effects through provision of new recreational natural greenspaces or improvements to existing open spaces.</u>
MM115	Page 215	Biodiversity and Geological Conservation – paragraph 5.4.32	Add new text to end of paragraph 5.4.32, as follows: 'Policy EN2 seeks to protect biodiversity and geodiversity within the District and to identify principles for enhancing the overall biodiversity resource and stemming losses. It identifies a range of factors that need to be taken into account in identifying potential land for development, in taking into account

			impacts on the districts biodiversity resource in decision-making and in making an assessment and managing proposals that come forward. <u>One of the most important principles in relation to conserving and enhancing biodiversity identified in the NPPF is that where ‘significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.’ It will therefore only be acceptable to consider compensation as a last resort and under circumstances where this can be carried out in accordance with best practice and guidance, such as that produced by the Chartered Institute of Ecology and Environmental Management.’</u>
MM116	Page 220	Policy EN2 Biodiversity and Geodiversity Criterion A North and South Pennine Moors	Amend criterion policy sub title and criterion A, as follows: <u>‘The North and South Pennine Moors SPAs and SACs</u> A. Any development that would be likely to have a significant effect on a European Site either alone or in combination with other plans or projects will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there will be no adverse effects on site integrity then the project will have to be refused <u>unless the derogation tests of Article 6(4) Habitats Directive can be met.’</u>
MM117	Page 220	Policy EN2 Biodiversity and Geodiversity – insert new criterion B, after A and before Locally Designated Sites	Insert new criterion B and sub title as follows: <u>‘Sites of Special Scientific Interest</u> <u>B Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.’</u>

MM118	Page 220 - 221	EN2 Criterion B	<p>Amend criterion reference to reflect new Criterion B and amend text as follows:</p> <p>‘Locally Designated Sites</p> <p>BC. Development likely to have an direct or indirect adverse effect on a site of ecological/geological importance (SEGIs and RIGS) or a site of local nature conservation value (Bradford Wildlife Areas) will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the substantive nature conservation value of the site. Proposals that are likely to have an impact on such sites will be assessed according to the following criteria;</p> <ol style="list-style-type: none"> 1. Whether works are necessary for management of the site in the interests of conservation. 2. Whether adequate buffer strips and other <u>appropriate</u> mitigation <u>measures, which could include adequate buffer strips, have</u> has been incorporated into the proposals to protect species and habitats for which the Locally <u>Designated</u> Site has been designated. 3. The development would be expected to result in no overall loss of habitat, <u>through avoidance, adequate mitigation or, as a last resort, the provision of and mitigation could be expected to include</u> compensatory habitats adjacent to or within the vicinity of any losses proposed. Existing habitats and proposed mitigation <u>or compensatory measures</u> should be quantified.’
MM119	Page 221	Policy EN2 Criterion C	<p>Amend criterion reference to reflect new Criterion B and amend text as follows:</p> <p>‘Habitats and Species outside Designated Sites</p> <p>C-D Proposals that may have an adverse impact on important habitats and species outside designated sites need to be assessed according to the following criteria:-</p>

			<p>1. The potential for adverse impact on important/priority habitats that occur outside designated sites</p> <p>2. The potential for adverse impact on species of international, national and local importance</p> <p>3. The extent to which appropriate measures to mitigate any potentially harmful impacts can be identified and carried out.</p> <p><u>4 As a last resort, the extent to which appropriate measures to compensate any potentially harmful impacts can be identified and carried out.'</u></p> <p>The assessment needs to take account of:</p> <p>West Yorkshire Site Selection Criteria and Where relevant developers will be expected to submit (European) Protected Species surveys and other ecological assessment related information with their application.</p> <p>Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted²</p>
MM120	Page 221	Policy EN2	<p>Amend criterion reference to reflect new Criterion B and amend text as follows</p> <p>'Enhancement</p> <p>D E. Plans, policies and proposals should contribute positively towards the overall enhancement of the District's biodiversity resource.</p> <p>They should seek to protect and enhance species of local, national and international importance and to reverse the decline in these species.</p> <p>The Council will seek to promote the creation, expansion and improved management of important habitats within the district and more ecologically connected patchworks of grasslands, woodlands and wetlands. Opportunities for specific habitat creation within development proposals will be sought,</p>

			<p>including provision for future management.</p> <p><u>The Council will seek to establish coherent ecological networks that are resilient to current and future pressures. Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted.</u></p> <p>Habitats of the moorland will be enhanced and landowners or occupiers will be actively encouraged to manage important areas for bird foraging to ensure continued provision of suitable habitat.</p> <p><u>Where supported by evidence</u> Tthe Council will recognise the importance of foraging/ commuting areas for protected and SPA/<u>SSSI species qualifying features</u> outside the statutory designated area as a material consideration in the preparation of development plans and in the determination of planning applications. Where <u>supported by evidence</u>, foraging sites, currently outside the SPA/SAC <u>and SSSI</u> will be considered for designation <u>as a Locally Designated Site.</u></p>
MM121	Page 224	Paragraph 5.4.66	<p>Amend paragraph 5.4.66, as follows:</p> <p>The historic environment faces a number of challenges resulting from minor, incremental alterations to significant and damaging changes which can affect the nature and authenticity of the structure or space. In most cases these changes are controlled by the Council through planning consents; however, <u>some changes which occur are unauthorised and unsympathetic harm to the significance of heritage assets can also occur through neglect, lack of maintenance or small incremental changes which can, over time erode the character of these assets.</u></p>
MM122	Page 238	Policy EN6 Energy Paragraph 5.4.125	<p>Amend paragraph 5.4.125 as follows:</p> <p>‘The regional study recognised commercial wind as having the potential to make a significant contribution to the renewable energy resource. There are a number of factors that influence a districts capacity to accommodate groups of</p>

			commercial scale wind turbines; wind speeds, the extent of the urban area and outlying settlements and landscape, environmental and ecological constraints. Two strategic constraints that have an influence on the potential for wind energy in Bradford District were identified in previous work at a regional level; the South Pennine Moors Special Protection Area (also a Special Area of Conservation) and the consultation zone around Leeds/Bradford Airport. The study recognised that further work needed to be done at a district level. National planning guidance identifies in some detail particular planning considerations that relate to wind turbines.'
MM123	Page 238	Paragraph 5.4.126	<p>Delete paragraph 5.4.126:</p> <p>'The findings of the latest regional study provides an evidence base to assist local authorities in developing a strategic approach to renewable and low carbon energy. The study recognised that further work needed to be done at a district level, particularly relating to evaluating the relationship between wind energy, landscape character and the natural environment. There is also a need to consider in association with the airport authority, whether advancements in technology would allow mitigation of the constraints associated with the airport.'</p> <p>Replace Paragraph with the following:</p> <p><u>National planning guidance advises that in identifying suitable areas for renewable and low carbon energy 'local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts.'</u> The views of local communities likely to be affected are also considered to be important. When identifying suitable areas it is <u>important to set out the factors that will be taken into account when considering individual proposals in these areas, which may be dependent on investigatory work underpinning the identified area. Recent ministerial statements have emphasised the importance of addressing planning impacts identified by affected local communities and the benefits of identifying suitable areas through the plan-making process.</u></p>

MM124	Page 239	Paragraph 5.4.127	<p>Amend paragraph 5.4.127 as follows:</p> <p>'Proposals will need to have an assessment of environmental, economic and social impacts. In relation to environmental impacts, some parts of the upland moorland areas are particularly unspoilt and are valued for tranquillity and wilderness appeal or are of historic importance because of their archaeology or other historic importance. <u>Landscape character areas are supported in national guidance as a tool for assessment.</u> Within Bradford open moorland provides the backdrop to the wide shallow valleys of the rivers Aire and Wharfe, where locations along the moorland edge offer long extensive views. Within such an open landscape, in areas where there are few other structures, vertical elements, such as wind turbines, can be prominent features, whereas smaller scale turbines are less intrusive when viewed in close conjunction with existing built and natural features. <u>West Yorkshire Ecology have produced guidance for ornithological information required to support small wind turbine developments.</u>'</p>
MM125	Page 239	Policy EN6 Criterion A (1)	<p>Amend criterion A (1)</p> <p>1. Identifying <u>suitable strategic areas and opportunities for</u> low carbon and renewable energy opportunities.</p>
MM126	Page 240	Paragraph 5.4.130	<p>Delete paragraph 5.4.130 and renumber subsequent paragraphs:</p> <p>It is recognised that further work still needs to be carried out in order to achieve an assessment of strategic opportunities to secure decentralised energy. This will use as a starting point the recent study of Low Carbon and Renewable Energy Capacity in Yorkshire and the Humber. It will investigate the potential for larger scale low carbon schemes to serve new development and existing communities.</p>
MM127	Page 240	EN7 Flood Risk paragraph 5.4.132	<p>Add additional sentence at end of paragraph:</p> <p>'The overall objectives are to appraise, manage and reduce the risk of flooding. Policy EN7, set out below, identifies principles to guide the process of</p>

			identifying locations for future development while seeking to reduce flood risk, assess proposals that come forward and adopt a positive approach to water management. <u>The NPPF defines flood risk as: ‘a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.’</u>
MM128	Page 242	EN7 Flood Risk paragraph 5.4.143	<p>Add additional sentence at end of paragraph:</p> <p>‘This approach reflects that in the NPPF, which requires Local Plans to take account of climate change over the longer term and plan new development to avoid increased vulnerability to the range of impacts arising from climate change. The sequential testing approach is supported and Technical Guidance has been produced setting out how this policy should be implemented. Key principles identified are; safeguarding land from development that is required for current and future flood management, using opportunities offered by new development to reduce the causes and impacts of flooding and developing policies to manage flood risk from all sources. <u>When applying sequential testing principles to the choice of sites for future development, where data exists, all sources of flood risk will be taken into account, including those associated with ground water flooding.</u>’</p>
MM129	Page 249	Policy EN8 Criterion B	<p>Amend criterion B, as follows:</p> <p>‘Proposals for development of land which may be contaminated or unstable must incorporate appropriate investigation into the quality of the land. Where there is evidence of contamination <u>or instability</u>, remedial measures must be identified to ensure that the development will not pose a risk to human health, public safety and the environment. Investigation of land quality must be carried out in accordance with the principles of best practice.’</p>

MM130	Page 251	EN8 Insert new paragraph following existing paragraph 4.5.181 and before existing paragraph 4.5.182	<p>Add new paragraph as follows:</p> <p><u>The Council will undertake a programme of modelling to assess the air quality effects of proposed allocations on areas where air quality is a matter of concern, including European Sites designated for nature conservation importance. The programme will assess air quality effects from local roads in the vicinity of proposed allocations on nearby European Sites (including those from increased traffic, construction of new roads and up[grading of existing roads), as recommended in work carried out on Habitats Regulations Assessment. The impacts on vulnerable locations from air quality effects of increased traffic on the wider road network will also be tested using traffic projections and distance criterion. This will be followed by local air quality modelling where required at the pre-allocations testing stage and the development of any mitigation measures required to ensure that there are no adverse effects on the European Sites.</u></p>
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Section 5.5 Minerals

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike-through
MM131	Page 255	Policy EN9 Criterion A	<p>Add additional criteria to A to be numbered 1 and re-number the existing criteria 1, 2, 3 and 4 as 2, 3, 4 and 5. New Criterion 1 to read:</p> <p>1. <u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence.</u></p>
MM132	Page 256	Policy EN9 Criterion B	<p>Add additional criteria to B to be numbered 1 and re-number the existing criteria 1, 2, 3 and 4 as 2, 3, 4 and 5. New Criterion to read:</p> <p>1. <u>For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence.</u></p>
MM133 MM133 (Continued)	Pages 258 – 259	Paragraph 5.5.14	<p>Insert four new paragraphs to follow paragraph 5.5.13, as follows:</p> <p><u>5.5.14 The Local Aggregates Assessment for West Yorkshire 2012 (WY LAA) confirms that the sub-region is heavily dependant upon higher specification crushed rock aggregate imports from neighbouring authorities, and in particular Derbyshire and North Yorkshire. Substantial crushed rock aggregate reserves exist within West Yorkshire; however the majority of these reserves do not comprise concreting or road stone grade materials and the quality of the sub-region's stone resources is such that any significant future reduction in the reliance of West Yorkshire on high specification aggregate imports from neighbouring authorities is considered to be unlikely.</u></p>

Table: TABEN10

<u>West Yorkshire Crushed Rock (CR) Aggregate Landbank Figures</u>				
<u>Estimated CR Consumption 2009 (tonnes)</u>	<u>Estimated CR Imports from Neighbouring Authorities 2009 (tonnes)</u>	<u>Ten Year Average Annual CR Sales (2003-2012) (tonnes)</u>	<u>CR Reserves as of 31 Dec 2012 (tonnes)</u>	<u>Landbank (Reserves/ Avg Sales)</u>
<u>2,330,000</u>	<u>1,499,505</u>	<u>1,000,000</u>	<u>28,500,000</u>	<u>28.5 Years</u>

Note: Above Figures are taken from The Local Aggregate Assessment for West Yorkshire 2012, wherein full details of how these figures have been derived can be found.

5.5.15 The landbank calculation set out in the LAA, as repeated in table TABEN10 above, represents a calculation of the length of time it would take to exhaust current permitted reserves of Crushed Rock within West Yorkshire if average annual sales continue at historic average levels. However the fact that this figure is in excess of the 10 year minimum recommended within the NPPF in no way implies that sufficient crushed rock reserves exist within West Yorkshire to meet West Yorkshire's construction aggregate needs. In fact the figures set out in the WY LAA imply that the level of aggregate product within West Yorkshire could satisfy, at most, 40% of demand, with imports from neighbouring authorities estimated to be almost 50% higher than indigenous production.

5.5.16 In order to secure continuity of supply of crushed rock the West Yorkshire Authorities have engaged with neighbouring authorities, in particular Derbyshire and North Yorkshire, through the Aggregates Working Party and through the production of the WYLAA. This has resulted in the adoption of LAAs by those neighbouring authorities which provide for the continuation of levels of extraction which are sufficient to allow for the continued supply of aggregates into West Yorkshire.

5.5.17 Although Bradford is not a significant aggregate producer the small quantities of crushed sandstone aggregate by-product which are produced do contribute towards redressing the trade imbalance highlighted above and absorbing some local demand for lower specification bulk aggregates and building sand. Therefore, notwithstanding the fact that the West Yorkshire landbank calculated in the 2012 WYLAA (based upon historic average sales)

			<u>is substantially in excess of the 10 year minimum it is considered inappropriate to adopt a strongly negative policy position towards the extraction of crushed rock aggregates in the District.</u>
MM134 MM134 (Continued)	Pages 263 – 264	Paragraph 5.5.20	<p>Delete paragraph 5.5.20 and replace with four new paragraphs, as follows:</p> <p>5.5.20 Research undertaken at a regional level and the emerging Local Aggregates Assessments of neighbouring authorities have identified a potential future shortfall in meeting the demand for sand and gravel within West Yorkshire from local land won extraction. Therefore policy EN11 confirms the Council's commitment to taking any appropriate opportunities to contribute towards the provision of a 7 year sand and gravel landbank level within West Yorkshire by supporting sand and gravel extraction within an area of search constrained by specified environmental criteria.</p> <p><u>5.5.20 The Local Aggregates Assessment for West Yorkshire 2012 (WYLAA) identifies that the sub-region is heavily dependant upon sand and gravel imports from neighbouring authorities, and in particular 18 March 2015 North Yorkshire. Very limited sand and gravel reserves exist within West Yorkshire, with only two relatively small sites reported in the WYLAA (located in Kirklees and Wakefield), possessing reserves totalling 1.6 million tonnes. No reserves of sand and gravel exist within the Bradford District. British Geological Survey (BGS) resource maps indicate that some potentially viable sand and gravel resources may remain within West Yorkshire, including river terrace deposits along the Wharfe and Aire Valleys in the Bradford District. However previous BGS research has identified minerals extraction industry scepticism that the remaining resource would be economically viable to exploit due to the constrained nature of the remaining deposits.</u></p>

Table: TABEN11

<u>West Yorkshire Sand and Gravel (S&G) Landbank Figures</u>				
<u>Estimated S&G Consumption 2009 (tonnes)</u>	<u>Estimated S&G Imports from Neighbouring Authorities 2009 (tonnes)</u>	<u>Ten Year Average Annual S&G Sales (2003-2012) (tonnes)</u>	<u>S&G Reserves as of 31 Dec 2012 (tonnes)</u>	<u>Landbank (Reserves/ Avg Sales)</u>
810,000	490,000	130,000	1,600,000	12.3 Years

Note: Above Figures are taken from The Local Aggregate Assessment for West Yorkshire 2012, wherein full details of how these figures have been derived can be found.

5.5.21 The landbank calculation set out in the LAA, as repeated in table TABEN11 above, represents a calculation of the length of time it would take to exhaust current permitted reserves of Sand and Gravel within West Yorkshire if average annual sales continue at historic average levels. However the fact that this figure is in excess of the 7 year minimum recommended within the NPPF in no way implies that sufficient sand and gravel reserves exist within West Yorkshire to meet West Yorkshire's construction aggregate needs. In fact the figures set out in the WY LAA imply that West Yorkshire historic production could satisfy, at most, 16% of demand, with imports from neighbouring authorities estimated to be almost 4 times higher than indigenous production.

5.5.22 In order to secure continuity of supply of sand and gravel the West Yorkshire Authorities have engaged with neighbouring authorities, in particularly Derbyshire and North Yorkshire, through the Aggregates Working Party and through the production of the WYLAA. This has resulted in the adoption of LAAs by those neighbouring authorities which provide for the continuation of levels of extraction which are sufficient to allow for the continued supply of aggregates into West Yorkshire.

5.5.23 Notwithstanding the fact that the West Yorkshire landbank calculated in the 2012 LAA, based upon historic average sales, is in excess of the 7 year minimum, given West Yorkshire's reliance on 18 March 2015 imports from neighbouring authorities, it is considered inappropriate and unsustainable to adopt a policy position that would not be supportive of any environmentally acceptable proposals for the extraction of sand and gravel

			<u>resources within the District which may come forward within the plan period. Therefore policy EN11 is supportive in principle of proposals for sand and gravel extraction, within an area of search constrained by specified environmental criteria, except in the unlikely event that the LAA indicates that no additional permitted reserves of sand and gravel are required.</u>
MM135	Pages 263 – 265	Policy EN11 criterion D (1) and D (2)	<p>Amend section title as follows:</p> <p>‘Section Title: Sand, Gravel, Fireclay, <u>Coal</u> and Hydrocarbons <u>(oil & gas)</u>’</p> <p>Amend Policy Title as follows:</p> <p>‘Policy Title: Policy EN11: Sand, Gravel, Fireclay, <u>Coal</u> and Hydrocarbons <u>(oil & gas)</u>’</p> <p>Amend criterion D1 and D2 as follows:</p> <p>‘D.1. Proposals associated with the exploration and appraisal of <u>hydrocarbons (oil & gas)</u> resources will be supported in principle providing that the proposal accords with other policies within the Local Development Plan and all of the following criteria are met:</p> <p>D.2. Proposals for the commercial production of <u>hydrocarbons (oil & gas)</u> will be supported in principle providing that the proposal accords with other policies within the Local Development Plan and all of the following criteria are met:</p>
MM136	Page 264	Policy EN11 Criterion C	<p>Amend criterion C as follows:</p> <p>‘C. Proposals for coal extraction will not be permitted unless the coal resource would otherwise be sterilised by another form of development or all of the following criteria are met:</p> <p>1. Any viable fireclay resources will also be recovered, and;</p> <p>2. The applicant can demonstrate that the quality of the coal resource proposed to be extracted is such that it is suitable for use as an energy mineral, and;</p> <p>3. <u>2.</u> One of the following circumstances applies:</p>

			<p>i. The proposals are environmentally acceptable, or can be made so by planning conditions or obligations, or;</p> <p>ii. The proposal provides national, local or community benefits which clearly outweigh the likely impacts of the development'</p>
MM137	Page 270	Policy EN12 Criterion B (4)	<p>Amend criterion B (4) as follows:</p> <p>4. The applicant has demonstrated that non of the sandstone resource beneath the site could be extracted without prejudicing the development of the site <u>due to ground level or engineering issues, or;</u></p>

Section 5.6 Waste

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification
			New text: <u>underlined</u> Deleted text strike through
MM138	Page 276	Policy WM1 paragraphs 5.6.1 – 5.6.3	<p>Amend paragraphs 5.6.1 to 5.6.3, as follows:</p> <p>Waste is often seen as a by-product of living, to be disposed of by the cheapest possible method. Bradford has traditionally been reliant upon sending waste to landfill sites outside the District and there is limited <u>waste management</u> infrastructure to deal with waste within the Bradford District to deal with certain types of waste, in particular Local Authority Collected Waste (LACW) and Commercial and Industrial Waste by any other means.</p> <p>However, the policy direction for waste management is changing <u>has changed over the years.</u> The European Waste Framework Directive 2008 requires appropriate measures to prevent or reduce of waste production and its harmfulness and secondly the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy.</p> <p>This European guidance is subsequently delegated to a national level through the Waste (England and Wales) Regulations 2011, <u>National Planning Policy for Waste (NPPW) Oct 2014</u></p>

			<p>and the Waste Management Plan for England Dec 2013, and planning policy Statement 10, National Planning Policy for Waste (NPPW) Oct 2014 and the Waste Management Plan for England Dec 2013, which set out how England will meet the European directives on waste and deliver a shift towards a more sustainable management of waste at a local level.</p> <p>In an effort to achieve greater sustainability and <u>net</u> self sufficiency, the current approach to waste management is no longer acceptable <u>needs to improve and change further</u>. It is essential that greater emphasis is placed on avoiding waste production and managing waste produced in the most sustainable way, making use of waste as a resource and only disposing of the residue that has no value.</p> <p>And amend paragraph 5.6.7, as follows:</p> <p>Policy WM1 creates a strategic planning framework to minimise the negative effects of the generation and management of waste on human health and the environment. It further states that waste policy should encourage a reduced use of resources, and favours the practical application of the waste hierarchy. One of the primary mechanisms of applying this application is the delivery of an adequate range of waste management facilities to ensure waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District. A range of new facilities shall be needed to deal with tonnages of Commercial and Industrial (C&I) and Solid Municipal Waste (MSW – Council collected waste) <u>Local Authority Collected Waste (LACW)</u> arisings.</p>
MM139	Page 276	Paragraph 5.6.8 – 5.6.14	<p>Insert new text setting and sub section title to follow paragraph 5.6.9, as follows:</p> <p><u>Evidence</u></p> <p><u>5.6.9 Information relating to the specific details of this evidence base can be found within the Waste Management DPD and the supporting Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014).</u></p> <p><u>WASTE ARISINGS - CURRENT POSITION</u></p> <p><u>5.6.10 The future scale of waste arisings and the waste management facilities which need to be planned for in Bradford District is critical. This section considers the need for new waste management facilities.</u></p>
MM139 (Continued)			

MM139
(Continued)

5.6.11 Analysis is based on the Council's Waste Data Forecasting Model. For a full explanation of the methodology and sources used to calculate waste arisings and forecasts please refer to Bradford Waste Needs Assessment, Capacity Gap Analysis and Requirement Study.

5.6.12 The majority of current waste arisings within Bradford District come from Commercial and Industrial Waste (C&I), Construction, Demolition and Excavation Waste (CDEW) and Local Authority Collected Waste (LACW) which combined equate to just under ¾ of the total arisings. Agricultural waste has increased significantly from previous figures, mainly due to the new legislation coming into force in 2010. Table 1 sets out the current waste arisings for Bradford.

Table WM1: Summary Total Waste Arisings in Bradford (2012)

<u>Type of Waste Arising</u>	<u>Arisings (Tonnes)</u>	<u>%</u>
<u>Agricultural Waste</u>	<u>283,132</u>	<u>20.20</u>
<u>Commercial Waste</u>	<u>254,314</u>	<u>18.20</u>
<u>Industrial Waste</u>	<u>219,773</u>	<u>15.71</u>
<u>Construction Demolition and Excavation</u>	<u>350,000</u>	<u>25.02</u>
<u>Hazardous Waste</u>	<u>19,155</u>	<u>1.37</u>
<u>Local Authority (Including Calderdale</u>	<u>272, 668</u>	<u>19.50</u>
<u>Total***</u>	<u>1,399,042</u>	<u>100</u>
<u>Waste Water**</u>	<u>1,024,568</u>	

Source: Environment Agency Waste Data Interrogator (WDI) 2012*. Yorkshire Water 2014.**

Total Being Planned for in the Waste Management DPD through either planning policy or site allocations or a combination of both***

5.6.13 The projected forecast waste arisings for Bradford District draws on the most reliable and robust data available for each waste stream. The Council are taking forward a 'Growth' based scenario, which follows a growth rate of 33% estimated Gross Value Added (GVA) for all the waste streams of Commercial, Industrial, Agricultural, CDEW and Hazardous. A separate growth rate has been applied to Local Authority Collected Waste to ensure alignment with the Municipal Waste Minimisation and Management Strategy, and zero static growth rate applied to

Agricultural waste.**Table WM2: Forecast Waste Arisings in Bradford (2013–30) using Bradford Waste Forecasting Model**

<u>Waste Stream</u>	<u>2013</u>	<u>2018</u>	<u>2022</u>	<u>2026</u>	<u>2030</u>
<u>Agricultural Waste*</u>	<u>283,133</u>	<u>283,133</u>	<u>283,133</u>	<u>283,133</u>	<u>283,133</u>
<u>Commercial and Industrial Waste*</u>	<u>513,830</u>	<u>538,326</u>	<u>558,882</u>	<u>580,329</u>	<u>602,721</u>
<u>CDEW*</u>	<u>447,604</u>	<u>461,194</u>	<u>472,360</u>	<u>483,800</u>	<u>495,515</u>
<u>Hazardous Waste*</u>	<u>19,153</u>	<u>19,764</u>	<u>20,267</u>	<u>20,782</u>	<u>21,311</u>
<u>Local Authority Collected Waste**</u>	<u>306,148</u>	<u>338,736</u>	<u>358,179</u>	<u>369,852</u>	<u>381,188</u>
<u>Total Tonnes</u>	<u>1,569,868</u>	<u>1,641,153</u>	<u>1,692,821</u>	<u>1,737,896</u>	<u>1,783,868</u>

Source: *Bradford Council Waste Data Forecasting Model, **Bradford Council Waste Strategy Team

5.6.14 While these levels should be planned for in terms of the provision of expanded and new facilities, the Waste Management DPD policies will also ensure that opportunities to reduce, re-use and recycle waste will be maximised and that some flexibility and contingency in the levels of future waste management facilities

			<u>provision will be made on a, monitor and manage basis.</u>
MM140	Page 276	Paragraph 5.6.8	<p>Insert new paragraphs to follow from new paragraph 5.6.14 above, as follows:</p> <p><u>CROSS-BOUNDARY WORKING</u></p> <p><u>5.6.15 The Local Plan must give consideration to cross-boundary issues when setting spatial policy and waste management allocations.</u></p> <p><u>5.6.16 Bradford Council will continue to work collaboratively with neighbouring local authorities and other local authorities where waste import / export relationships exist now and are recognised to likely continue in to the future recognising the importance of the duty to cooperate in achieving net self sufficiency for Bradford. This will ensure a collaborative cross-boundary approach to waste management is established and maintained. In addition to the continued active participation in the Yorkshire and Humber Waste Technical Advisory Body, the Council will:</u></p> <ul style="list-style-type: none"> • <u>Share with neighbouring authorities and statutory bodies all relevant information, data and its analysis relating to current and future waste arisings across all waste streams, technologies and performance in reducing, re-using, recycling and disposing of waste;</u> • <u>Work collaboratively on emerging Local Plans and their future updates where appropriate and practical;</u> • <u>Provide comment on waste related planning applications where appropriate to do so;</u> • <u>Support the commissioning of joint monitoring reviews, data updates and specific waste related studies to support regional and sub-regional waste management and future policy development where appropriate and practical.</u> <p><u>Attend and contribute to any groups, bodies or meetings to support cross boundary working on waste.'</u></p>
MM141	Page 277	Policy MW1 supporting text	<p>Insert new paragraphs and section title to follow from new paragraph 5.6.16 above, as follows:</p>

			<p><u>'Policy WM1</u></p> <p><u>5.6.17 There is a need to consider how waste management policy developed within the Local Plan can deliver against the Core Strategy objectives and those within the Waste Management DPD. This includes the extent to which it is suitable to apply a waste management hierarchy within future policy.</u></p> <p><u>5.6.18 Policies WM1 and WM2 establish the strategic framework and spatial direction for managing waste in the Bradford District. The strategy will be implemented through more detailed policies and related documents as set out in the Waste Management DPD, which also shows specifically how sufficient capacity has been identified and assessed to meet the waste forecasts.'</u></p>
MM142	Page 277	Policy WM1	<p>Amend Policy WM1 as follows:</p> <p>'Policy WM1: Waste Management</p> <p>A. The Council will work with its partners and neighbouring authorities to integrate strategies for waste management in Bradford and at the sub-regional and regional levels. All forms of waste will be managed in accordance with the <u>principles of the</u> waste management hierarchy <u>in the following order of priority</u> :</p> <ol style="list-style-type: none"> <u>1. Waste prevention: avoiding the creation of waste in the first instance; then</u> <u>2. Preparing for Re-use: making best use of existing and new facilities; then</u> <u>3. Recycling and composting: making best use of existing and new facilities; then</u> <u>4. Energy Other recovery: making use of technologies that recover energy from waste; then</u> <u>5. Disposal: including the use of landfill as a last alternative.</u> <p>B. The Council will plan to ensure that sufficient capacity is located within the District to accommodate <u>for the most sustainable and environmentally effective management of</u> forecast waste arisings of all types of waste ,-reducing the reliance on other authority areas. In identifying waste management sites within the District the Council will give regard to cross boundary issues, including waste movement and location of facilities in adjacent areas; <u>working collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management and allow the District to become net</u></p>

			<u>self-sufficient.'</u>
MM143	Page 277	Policy WM1 Supporting text	<p>Insert new paragraphs after policy MW1, as follows:</p> <p><u>5.6.19 The Council's primary delivery mechanism for Policy WM1 will be the allocation of land for an adequate range of waste management facilities through the Waste Management DPD. This should be provided to ensure that waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District.</u></p> <p><u>5.6.20 The Waste Management DPD will also put forward a number of planning policies to support the delivery of allocated and unallocated waste management sites, and safe guard any existing waste management infrastructure vital to the delivery the waste hierarchy.</u></p> <p><u>5.6.21 The Municipal Waste Minimisation and Management Strategy (and subsequent updates) will also dictate how the Council will directly contribute towards moving waste up the hierarchy through future waste operations.</u></p>
MM144	Page 277	Policy MW1 Supporting text	<p>Add new sub section heading and paragraphs following new paragraph 5.5.21 above as follows:</p> <p><u>IDENTIFYING WASTE MANAGEMENT SITES</u></p> <p><u>5.6.22 European and national policy relating to forward planning for waste management requires Waste Planning Authorities to consider the most appropriate locations for waste facilities in the future. This should include the relationship of the site with the waste arisings, minimising the movement of waste, and also the consideration of the potential impact of waste management facilities on their surrounding environs. Consideration is given to the need to identify sites for the principal waste streams</u></p> <ul style="list-style-type: none"> • <u>LACW – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management facilities.</u> • <u>Commercial and Industrial – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management</u>
MM144 (Continued)			

MM144
(Continued)

- facilities.
- CDEW - there are number of existing sites transferring and managing this waste stream. On site recycling upon demolition and development will be encouraged to move management of this waste up the hierarchy. Sites will not be specifically identified for this waste stream.
- Agricultural – the majority of this waste stream will be managed within farm holdings, small amounts of ‘specialised’ agricultural waste can be managed at C&I facilities. Future waste arisings are identified in the evidence base as being very small, therefore this stream will continue on farm holdings, existing sites and identified C&I sites.
- Hazardous & Low Level Radioactive waste – Both these waste streams generate very low levels of waste arisings. Such low levels do not quantify the allocation of further sites specifically for the management of these waste types, the economies of scale are such that the provision of sites within the Plan area for the very small quantities of arising’s would be unlikely to be viable.
- Residual Waste for Final Disposal (i.e. Landfill) - the existing sub-regional and regional capacity does not quantify the allocation of a site for a new landfill for the disposal of residual waste following treatment¹.

5.6.23 Bradford Council will only be seeking to allocate Waste Management Facilities for the treatment of Local Authority Collected Waste (LACW) and Commercial and Industrial Waste. This strategic approach is based on the following factors:

- LACW and C&I are consider priority waste streams;
- Need to reduce biodegradable waste not being managed;
- Sites will be large scale and of strategic importance;
- Waste arisings are of a sufficient scale to allow the delivery of viability facilities;
- Other waste streams are capable of being managed ‘on-site’;
- Treating other waste streams at facilities with the sub-region / region is the most sustainable and environmentally effective approach.

5.6.24 Through the Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014), it has been identified that there is a capacity gap in the waste management facilities based on the current and future waste arisings.

¹ Memorandum of Understanding/Minutes/Agreements – Yorkshire and Humber Waste Technical Advisory Body

5.6.25 Table 3 establishes the current capacity gap, within the Bradford District applying the Growth Scenario with maximised recycling based on the Waste Needs Assessment Capacity Gap Analysis and Requirement Study (2014). This existing capacity gap will be reviewed and updated (if necessary) through the Waste Management DPD. The Waste Management DPD will also assess the future capacity gap for the plan period, ensuring the sufficient allocation of appropriate sites over the plan period.

¹ Memorandum of Understanding/Minutes/Agreements – Yorkshire and Humber Waste Technical Advisory Body - [Footnote]

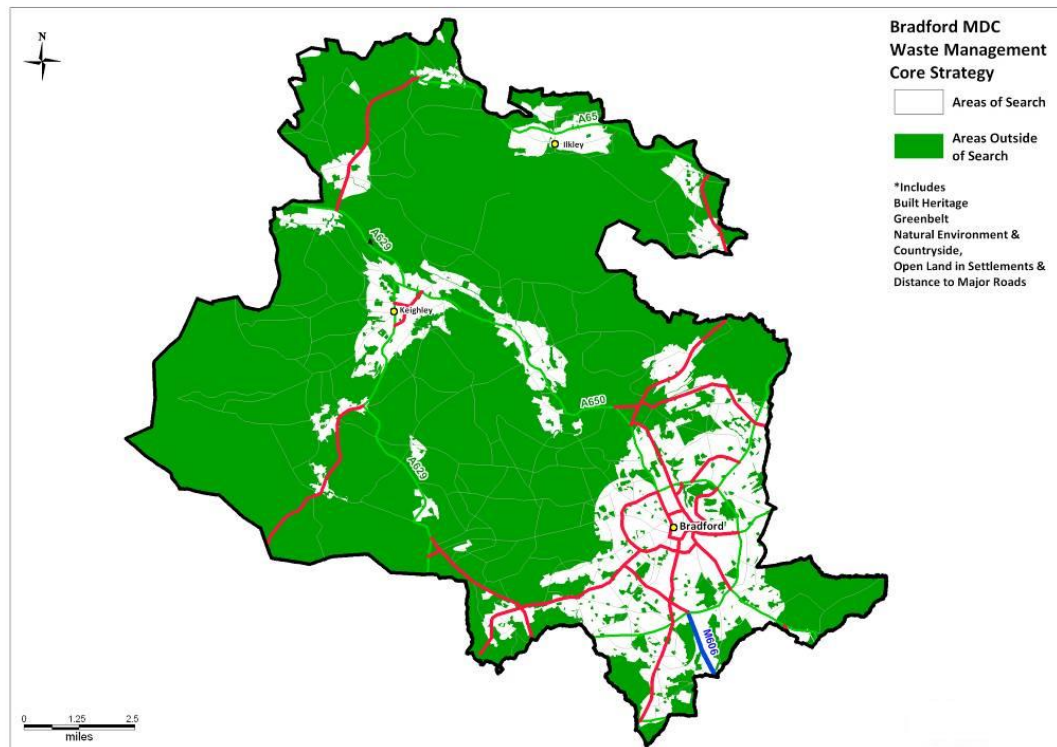
Table WM3 – Existing Waste Management Capacity Gap (tonnes)

<u>Waste Management</u>	<u>Existing Capacity Gap (Tonnes)</u>
<u>Landfill (non-hazardous)</u>	<u>59,439</u>
<u>Landfill (hazardous)</u>	<u>74</u>
<u>Landfill (CD&E)</u>	<u>201,200</u>
<u>Energy recovery (LACW & C&I)</u>	<u>203,169</u>
<u>Incineration (Specialist High Temp)</u>	<u>833</u>
<u>Recycling (C&I and LACW)</u>	<u>400,084</u>
<u>Recycling (aggregates CD&E)</u>	<u>112,975</u>
<u>Recycling (specialist materials– including metal recycling, End of Life Vehicles and WEEE)</u>	<u>-1,059</u>
<u>Composting</u>	<u>34,340</u>

				<u>Residual Mechanical Treatment</u>	<u>109,146</u>	
				<u>Treatment Plant (including Anaerobic Digestion, specialised treatment of biodegradable liquids and wastes, organic waste treatment by distillation)</u>	<u>-52,376</u>	
MM145	Page 278	Policy WM2 & supporting text	<p>Amend policy WM2 and supporting text as follows:</p> <p><u>5.6.26 Policy WM2 establishes the principles of identifying appropriate locations for waste management facilities, establishing a strategic framework for the Waste Management DPD to allocate enough land for recycling and treatment to take place, to ensure that less waste goes to landfill.</u></p> <p>Policy WM2: Waste Management</p> <p>A. Sites for waste management facilities will be identified to deal with all Municipal Solid Waste (MSW) <u>Local Authority Collected Waste (LACW)</u> and Commercial & Industrial Waste (C&I) arisings within Bradford District. Sites will need to best meet environmental, economic and social needs.</p> <p>B. In identifying and selecting sites for the management of waste, an Area of Search (See Appendix 7) is established as the framework for identifying sites for new and expanded waste management facilities. Within the Area of Search, the following order of priority will be adopted:</p> <ol style="list-style-type: none"> 1. The expansion and co-location of waste facilities on existing, operational sites; 2. Established and proposed employment and industrial sites where modern facilities can be appropriately developed; 3. Other previously developed land within the Area of Search, including mineral extraction and landfill sites; 			

			<p>4. Greenfield, previously undeveloped sites within the Area of Search; 5. Sites within the Green Belt</p> <p>C. All potential waste management sites will be subject to detailed assessment of their individual characteristics, <u>cumulative impact, economic viability and the impacts of and the implications of</u> any waste development on surrounding areas. The Waste Management DPD will establish the detailed site development criteria using a similar approach to site identification as applied within the development of strategic <u>and local</u> criteria to include consideration of:</p> <p>1. Policy alignment; 2. Physical constraints to site development; 3. Proximity to waste arisings; 4. Adjacent uses.'</p>
MM146	Page 279	Policy WM2 supporting text	<p>New Supporting text to follow WM2, as follows:</p> <p><u>5.6.27 Figure WM1 illustrates the Area of Search – including the application of the Green Belt as a constraint (i.e. the Area of Search excluding areas within the Green Belt)</u></p> <p><u>Figure WM1 – Identified Area of Search</u></p>
MM146			

(continued)



5.6.28 The Council is of the opinion that taking into account the proximity of facilities to major settlements is a key factor in providing a network of facilities to ensure waste can be disposed of and Local Authority Collected Waste can be recovered in one of the nearest appropriate installations. By limiting the area of search to major settlements within the District, the Council is of the opinion the 'proximity principle' is fully embedded into the policy.

5.6.29 The need to avoid detrimental impacts upon the natural environment and countryside, built heritage, open land within settlements, adverse impacts on the South Pennine Moors SAC/SPA and a proximity to 1km of major roads is also considered to be compliant with the latest national guidance set out in the National Planning Policy for Waste when identifying suitable sites and areas for proposed waste management facilities.

MM146
(continued)

			<p>5.6.30 <u>Further information on the site identification and assessment can be found in the Waste Management DPD and the supporting Site Assessment Report.</u></p> <p>Delete paragraphs 5.6.9 and 5.6.10:</p> <p>Policies WM1 and WM2 set in place the principles of identifying appropriate locations for waste management facilities. These principles are key to ensuring much needed waste management infrastructure is delivered in the most sustainable and effective way for the treatment of waste and the avoidance of potential negative impacts.</p> <p>Policies WM1 and WM2 provide the strategic framework for developing the detailed policies in the Waste Management DPD of the Local Plan to achieve sustainable waste management. It will be consistent with the latest national policy guidance and will make provision for the forecast waste tonnages identified within the supporting Evidence Base Report. It will set out a detailed planning strategy and include criteria-based development management policies, as well as sites for new waste management facilities. These will include sites for Municipal Solid Waste and Commercial and Industrial Waste.</p>
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Section 5.7 Design

No main modifications

Section 6 Implementation and Delivery

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification
			New text: <u>underlined</u> Deleted text strike through
MM147	Page 302	Paragraph 6.23	Add to 'the sorts of matters for which planning obligations will be sought' the following additional point: <u>mitigation for impacts to the South Pennine Moors SPA/SAC.</u>
MM148	Page 303	Paragraph 6.26	Add additional sentence at end of paragraph 6.26, as follows: <u>A management and mitigation strategy and SPD will be produced which will set out a framework for delivering mitigation measures in relation to impacts on the South Pennine Moors SPA/SAC.</u>

Section 7 Monitoring

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification
			New text: <u>underlined</u> Deleted text strike through
MM149	Page 313	Table MO1. Target for Indicator IND1(EJ)	Annual delivery of 2897 <u>1600</u> jobs.

Section: Appendices

Modification No.	Page No.	Policy/ Paragraph	Proposed Modification New text: <u>underlined</u> Deleted text strike through
MM150	Page 348	Appendix 4: Parking Standards	<p>Insert the following definition:</p> <p><u>Minimal Operational Requirement: Parking that is required for a development to operate as set out in the Transport Assessment or Transport Statement, including but not exclusively; Operational parking space for commercial and service vehicles (that provides for manoeuvring space to enable the largest vehicle required to exit the site in forward gear); loading bays and disabled parking. Residential development that requires operational parking, such as residential or care homes, should, as far as possible, make provision within the site. This encompasses servicing, business visitors and employees who require daily access to their vehicles for their jobs. It does not include commuter parking.</u></p>
MM151	Page 349	Appendix 4: Parking Standards	<p>Amend standard in relation to C3 City and Town centres as follows:</p> <p>C3 Dwellings (City and Town Centres) – Average of 1 space per unit <u>minimal operational requirements</u></p>
MM152	Page 356	Appendix 6 Paragraphs 1.3 to 1.5	<p>Amend the text as follows:</p> <p>‘The Housing Trajectory and Previously Developed Land Scenarios</p> <p>1.3 Paragraph 47 of the NPPF states that Local Planning Authorities should illustrate the expected rate of housing delivery through a housing trajectory covering the plan period. Previous supplementary guidance to PPS3 set out details on housing trajectories and since the Government are yet to finalise the range of technical guidance which will support the NPPF that guidance has, as with the CSFED, been used in the production of the updated housing trajectory in this appendix.</p> <p>1.4 Housing trajectories support the ‘plan, monitor and manage’ approach to housing</p>

MM152
(Continued)

delivery by showing past and ~~estimating~~ **indicating** future performance by considering past rates of housing completions and projected completions to the end of the specified Local Plan period. Housing trajectories are normally developed as part of the supporting evidence base underpinning LDF production but once established they are used to monitor performance and are updated annually via the production of the Council's Annual Monitoring Report. The trajectories are not however policies.

1.5 The housing trajectory included at the end of this section has been based on the following elements:

- Actual completions over the period 2004-13 as assessed and set out within previous Annual Monitoring Reports. These years comprise a period when the overall housing market was initially in a buoyant state and also when there was strong delivery on windfall sites particularly within Bradford City Centre but within which there has been a subsequent period comprising a deep and unprecedented slump in the housing market. Both supply and demand has been severely impacted by recession, toxic debt and its effect on global and national credit, severely restricted mortgage lending to prospective house buyers and severely restricted borrowing to the construction industry reducing its capacity to start new schemes or complete existing ones.
- **Projected completions over the plan period based on Policy HO1 and under an assumption of both significantly improved land supply and significantly improved economic and housing market conditions. Estimated performance over the next few years, within which the effects of the recession are expected to linger and recovery is expected to be sluggish. It is important to stress that while housing completions in some parts of the country are showing signs of increase there is yet to be any significant pick up in completions within Bradford district. A cautious approach has therefore been taken in estimating completions over the first part of the plan period, because of the likely weak state of the local housing market and economy, severe restrictions on public sector spending and also because it will be some years before work on the Local Plan is sufficiently progressed to produce a significant increase to the available land supply.**
- **An assumption that the backlog in past under provision of new homes will be resolved over the full plan period – the 'Liverpool approach'.**
- **A reflection of the addition, in line with the NPPF of an additional 20% to the 5 year land supply requirement which will ensure a wider range and choice of sites and**

MM152
(Continued)

boost delivery in the early part of the plan period;

- The housing distribution strategy and settlement hierarchy set out within the Core Strategy and embedded within the Spatial Option. This envisages that delivery will be stimulated by a number of master planning initiatives which will deliver housing growth in different areas at different times. These **will result in** major injections into both the land supply and into investment and delivery. ~~will not be spread out evenly over the whole plan period, because of the work necessary to bring them to fruition, to put the necessary infrastructure in place, and to bring forward and test the relevant Development Plan Documents. The combined result of these factors means that the delivery profile within Bradford will be heavily weighted towards the middle and particularly the final phase of the plan period.~~ This will provide a major challenge to house builders as development activity rates over recent years have been substantially below the sort of levels needed to deliver the Core Strategy annual housing requirement of 2200.
- ~~The production of a Strategic Housing Land Availability Assessment and examination of its results – although it has a significant and important role to play, the SHLAA delivery trajectory cannot be simply transplanted into the housing trajectory in this chapter. This is because the SHLAA has taken a ‘local policy off’ approach and much of the supply within it is dependent on changes to the statutory development plan. The SHLAA supply is also larger than the housing requirement. The SHLAA has however assisted production of both the policies of the Core Strategy and this appendix by providing a detailed profile of the land supply, including how it is distributed both geographically and by type – for example whether green field or previously developed, and whether deliverable in the short term or longer term. The SHLAA has therefore enabled realistic alternative options to be assessed and can shine a light on the preferred option in terms of its implications in terms of existing planning designations and the challenges of overcoming site related constraints. The SHLAA has also provided input into the creation of realistic but challenging targets for delivery on brownfield land.~~
- ~~Scenario building table 1 (overleaf) has attempted, based on the elements above, to set out the scenarios which will show how overall housing completions and the percentage of delivery on PDL will vary across the plan period. This in turn feeds into the risk analysis at the end of this appendix.~~

The components making up the housing trajectory chart are as follows:

- **Net housing completions 2004-13**

- **Basic Policy HO1 housing target of 2,200 new homes per annum**
- **NPPF 20% buffer for years 1-5 of 440 dwellings**
- **Backlog of unmet need resolved over the 15 year plan period (7,687 dwellings in total) †**

MM153

Page 358

Table 1:
Scenarios
for Delivery

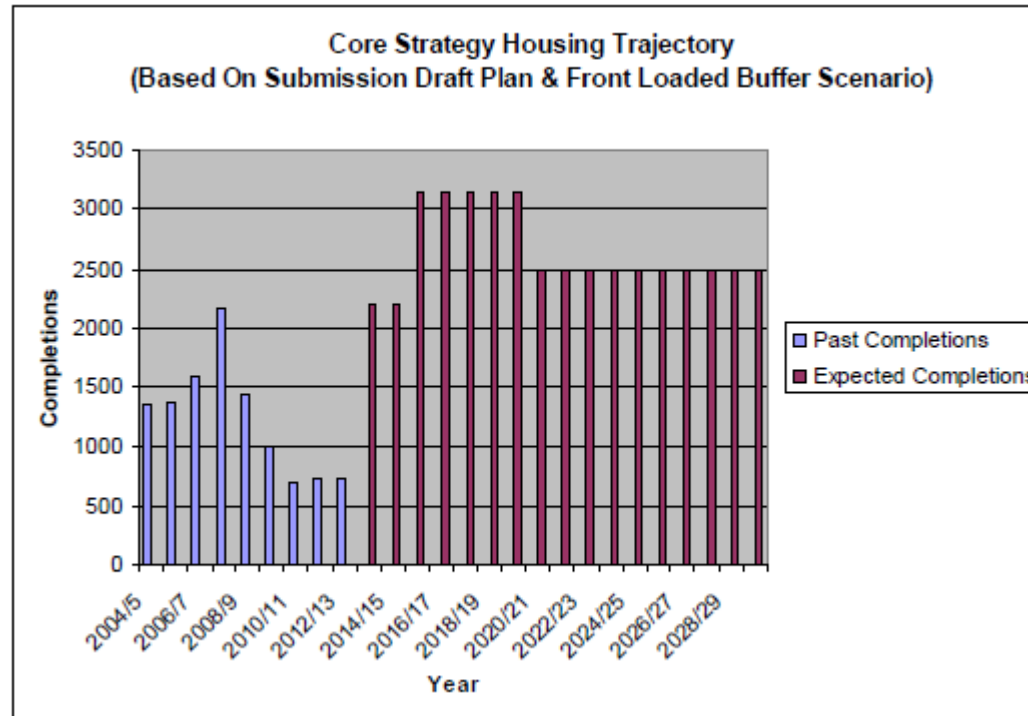
Delete Table 1 in its entirety.

MM154

Page 359-360

Table 2 &
Housing
Trajectory
Charts

Delete Table 2 and delete the 2 housing trajectory diagrams and replace with the following housing trajectory chart:



MM155	Page 361	Appendix 6, paragraph 1.6	<p>Amend paragraph 1.6, as follows:</p> <p>‘1.6 The Council has a program for the delivery of statutory development plan documents which will be fundamental to the delivery of the envisaged housing growth as set out above. This is because the plan making process for the Local Plan LDF needs to facilitate a massive step change in housing delivery which cannot be met either by the existing land supply or by the existing planning framework. Key decisions have to be made which have to be tested via extensive public engagements and by examination in public. The DPD’s involved are:</p> <ul style="list-style-type: none"> • The Shipley and Canal Road Corridor DPD - The Shipley and Canal Road Corridor is located within the main urban area of Bradford between the city centre and Shipley town centre. In support of Bradford’s regeneration priorities it is one of the key locations identified to deliver housing and economic growth in the district. Up to 3200 3,100 new homes are planned to be located in the CRC and the area has been identified as one of four Urban Eco Settlements in the Leeds City Region. In line with the sub area policies in the Core Strategy, the AAP will set out planning policies to guide development proposals in the area, along with details of how these proposals will be delivered. Issues and Options stage consultation took place between March and May 2013 with consultation on the Publication Draft expected to take place in the Autumn of 2015 with plan adoption expected in late 2016. • The Bradford City Centre Area Action Plan DPD - The City Centre AAP will set the vision and spatial strategy in support of the regeneration of Bradford City Centre. It will provide the statutory basis for the implementation of the City Centre Masterplan and associated four Neighborhood Development Frameworks and help deliver developments on the identified sites and in areas of change and constraint. Up to 3500 new homes are planned to be delivered within the City Centre during the plan period. Public consultation on the City Centre AAP Further Issues and Options took place between March and May 2013 with Publication draft consultation expected in late 2015 and adoption expected in late 2016.
MM155 (Continued)			<ul style="list-style-type: none"> • The Allocations Development Plan Document - this DPD will cover all other areas of the district outside of the 2 area action plans and will set out the approach to housing and employment development, the green belt, and the provision for sport and formal and informal recreational and open space. It will bring forward land allocations within the majority of the Bradford urban area, within the Principal Towns of Keighley, Ilkley and Bingley, together with the local growth centres and local service centres. Issues and Options stage consultation is scheduled for late 2015 2014.’

MM156	Page 365	Appendix 6, Table 3	<p>Modify the following text within the first line of the 'scenario':</p> <p><u>If the PDL delivery falls to levels which threaten the delivery of the targets and objectives set out within Policy HO6 consistently (for more than 3 consecutive years) and significantly below the expected levels as set out in the scenarios above and Policy HO6:</u></p> <ul style="list-style-type: none"> • The Council will consider intervention measures to assist the delivery of PDL sites including – land assembly by assisting occupiers to find alternative sites, bringing forward Council owners land, and use of CPO powers. • The Council will advance previously developed sites into the 5 year supply
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Report of the Deputy Director to the meeting of Executive to be held on 11th October 2016.

Subject:

AA

Inspection of Bradford local authority's arrangements for supporting school improvement

Summary statement:

The original review of the effectiveness of current arrangements to support school improvement in Bradford was completed in September 2014 by Professor David Woods. An interim report on progress made towards meeting the recommendations from the initial report was provided to the Committee in September 2015.

This report is the final part of the reporting cycle: reviewing the progress made towards meeting the outstanding recommendations from the initial report. The report also sets out the next steps in Bradford's school improvement journey, recognising where achievements have been made and where further work is required.

Michael Jameson
Strategic Director

Portfolio:

Education, Employment and Skills

Report Contact: Judith Kirk, Deputy Director
Education, Employment & Skills
Phone: (01274) 43[Ext No]
E-mail: judith.kirk@bradford.gov.uk

Overview & Scrutiny Area:

Children's Services

1. SUMMARY

- 1.1 Raising educational achievement is a key priority for the District. Professor Woods reported in September 2014 that outcomes for children and young people across all phases needed to improve at a faster rate.
- 1.2 The review of the effectiveness of current arrangements to support school improvement in Bradford took place over two days in September 2014 by Professor David Woods. The report took evidence from a range of stakeholders and a variety of documents were scrutinised. The report provided recommendations to improve the arrangements for school improvement in the local authority and inform the next stages of development for the Council's services and for the school partnerships.
- 1.3 An interim report was provided to the Committee on 22nd September 2015, providing evidence of the measure taken by the local authority to meet the recommendations made by Professor David Woods in his initial report. At that point, 13 of the original 17 recommendations had been met.
- 1.4 As of September 2016, all of the outstanding recommendations from the original report have been met: a summary of the actions taken towards meeting the outstanding recommendations can be found in Appendix 1.

2. BACKGROUND

- 2.1 In September 2014 Professor Woods was commissioned to review the school improvement service in Bradford. This resulted in a number of recommendations being made. Since that time there has been considerable change in the service and also in the delivery of school improvement moving to a 'school-led system'. This has involved a radical shift to the way the LA works with schools and holds them to account and also the role of the school improvement service. Progress towards meeting the recommendations was reported in September 2015. Appendix 1 contains a summary of progress made towards completing the four recommendations which were outstanding in 2015.
- 2.2 In his original report Professor Woods summarised the aims, scope and outcomes of his review in the following way: "The key words running through this review are a proper sense of CHALLENGE and URGENCY, the necessity of absolute FOCUS, the importance of the right SUPPORT, using appropriate LEVERAGE to secure solutions, working at an accelerated PACE to make progress, ensuring IMPACT in the short term and securing SUSTAINABILITY in the long term. Bradford is a proud city with a great past and ambitious plan for the future. That future depends absolutely on the success of its children and young people. The need for improvement is great and the task is urgent."
- 2.3 This report will outline how the work that has gone into meeting the original recommendations as well as how the local authority's future plans in terms of school improvement underpins each of the themes above.

Challenge

The overarching challenge for the local authority since 2014 has been to improve

outcomes for children and young people across the district in each phase of education and to remove inequalities in learning. The methodology for making this happen, as envisaged by Professor Woods, was for the LA to invite challenge and build it into every stage of the LA's intervention in underperforming schools, school governance and improvement processes through the implementation of his recommendations.

Evidence for embedding challenge and improving performance

Chart 1: Early Years Foundation Stage - % achieving a Good Level of Development

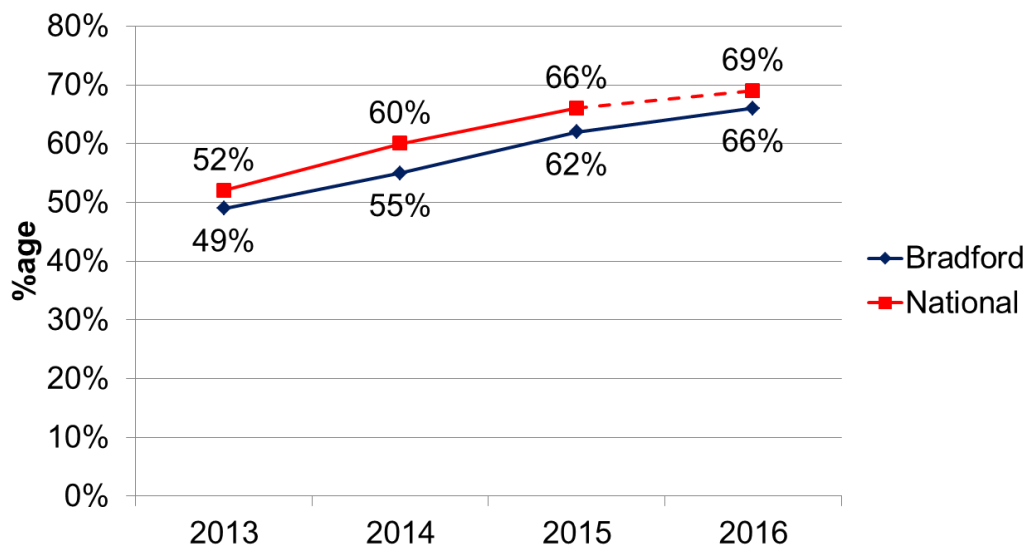
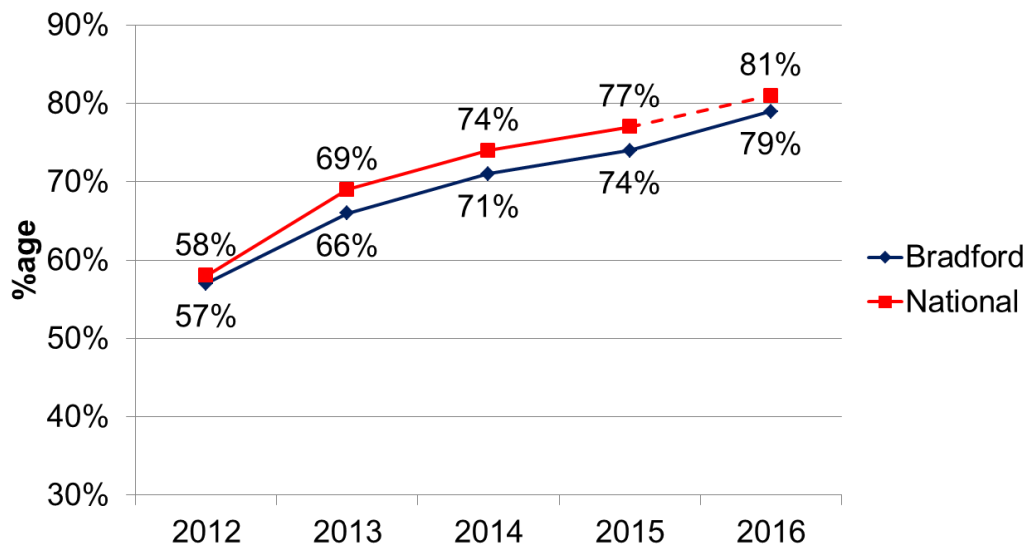


Chart 2: Year 1 pupils Working At the expected standard in Phonics



There have been improvements in performance for the youngest pupils in the district, at the Early Years Foundation Stage (EYFS) and for the Phonics reading assessment in Year 1. In Bradford the improvements at both key stages appear to have been at a faster pace than those seen on average nationally; for example, 66% of EYFS pupils had a Good Level of Development (GLD) in 2016 (55% in

2014), closing the gap with national to three percentage points, and 79% of pupils in Year 1 met the Phonics standard (71% in 2014), closing the gap with national to two percentage points.

Chart 3: Key Stage 1 % achieving expected standard by subject

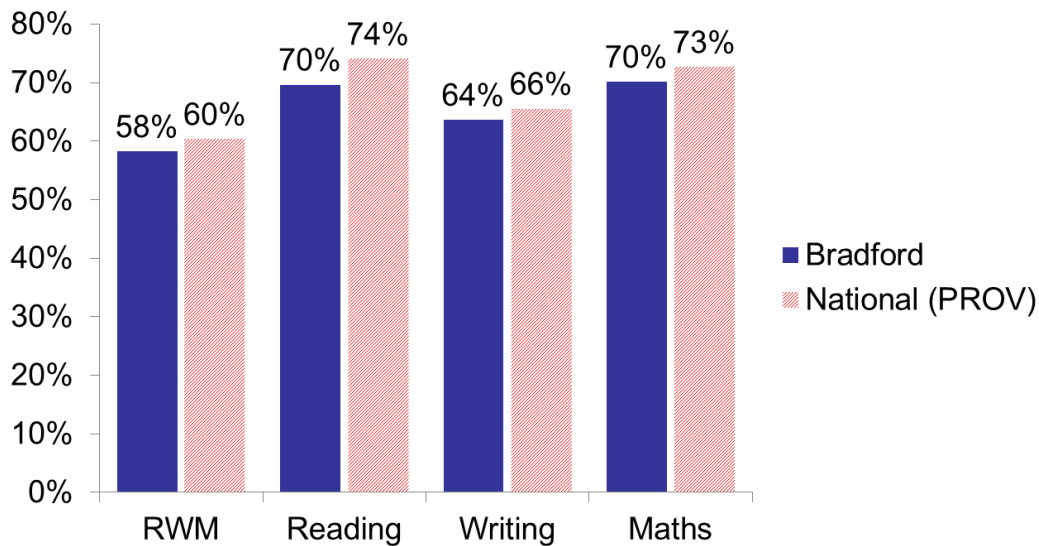
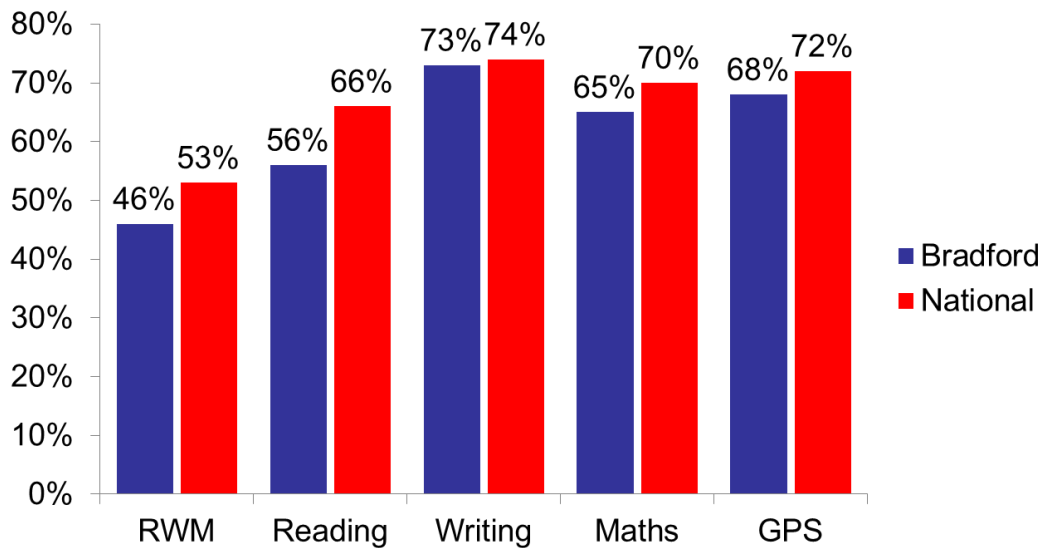


Chart 4: Key Stage 2 % achieving expected standard by subject



It is harder to compare the performance of pupils at the end of Key Stage 1 (KS1) and Key Stage 2 (KS2) over the years because 2016 has seen the introduction of entirely new performance and accountability measures. The LA is cautiously optimistic about the provisional KS1 results: they show a small gap with national on the new expected standards in reading, writing and mathematics, which certainly narrower than in previous years on the older measures.

The headline figures for Bradford's pupils' performance at the end of KS2 in 2016 is shown in the chart above: on the writing Teacher Assessment (TA) pupils performed just slightly below national, four per cent below national on the new

Grammar, Punctuation and Spelling (GPS) test and five per cent below national on the new mathematics test. The percentage of pupils meeting the expected standard on the new reading test and on the combined reading, writing and mathematics (RWM) measure are 10 per cent and seven per cent below national, respectively.

Table 1: Summary of performance and Floor Standard thresholds 2015 and 2016

	2015 Level 4+	2015 Level 4B+	2016 Expected Standard
National	80%	69%	53%
Bradford	76%	62%	46%
Floor Standard threshold (RWM)	65%	n/a	65%

The introduction of a new curriculum at KS2 in 2014 and new assessments in the summer of 2016 have presented a significant challenge to our schools and to the LA. Whilst the KS2 results in 2016 are volatile across England, not just in Bradford, our schools have performed well below the national average on the reading test: this means our performance on the combined RWM measure is below the national (46% in Bradford compared with 53% nationally). Whilst the relative gap with national was the same in 2015, i.e. seven percentage points lower, the LA recognises that improving proficiency in reading and enabling pupils to access the tests is a major issue in Bradford: this provides a focus for the work of the school improvement service and the primary partnerships for the coming academic year. It is important to note, however, the disparity in the percentages of pupils nationally meeting the “expected standards” in the last two years (see Table 1): in 2016 only 53% of pupils ‘secondary ready’ compared with 69% achieving a ‘good level 4’ to ensure they are ‘secondary ready’ in 2015¹.

In addition, the new Floor Standard attainment threshold aspect of 65% of pupils achieving the expected standard in RWM from 2016 means that the majority of Bradford schools, as well as the majority of all schools in England, will be below the threshold. The Department for Education will publish school level data in the Primary performance Tables in December but at this point we know that 147 of 150 LAs achieved below 65% on this measure. The KS2 Floor Standard judgement also includes a progress element, as outlined below.

Based on the provisional data the number of schools below the Floor Standard in Bradford has fallen from 15 in 2015 to seven in 2016: five LA maintained schools and two non-LA maintained. However, it is important to note that DfE has changed the basis for categorising schools below Floor Standard in 2016, as outlined below.

A school is now considered to be below the Floor Standard if less than 65% of pupils achieve the expected standard on the reading, writing and mathematics combined measure and falls below the Value Added progress threshold in **one or more** of the subjects. The threshold for reading is -5, writing is -7 and maths is -5. This is more challenging than in previous years, where schools had to be below the median national average for Expected (2 Levels) Progress in **all three subjects** to

¹ <https://www.gov.uk/government/news/package-of-primary-school-measures-will-raise-ambition-and-standards>

be below the Floor Standard (rather than in one or more).

Table 2: Primary Floor Standards

	2014	2015	2016 (provisional)
Bradford number of schools	20	15	7
Bradford % of schools	13	10	5
National % of schools	6	5	<i>Not yet available</i>

A similar level of change in the performance and accountability measures at Key Stage 4 (KS4) provides the context for the new Attainment 8 and Progress 8 scores achieved by pupils. Whilst the Attainment 8 score achieved by Bradford pupils is broadly just below average, at 4.5 (a grade of 5 gives the expected average grade) and they have a positive Progress 8 score, the provisional performance on pupils on the old 'gold standard' measure of 5 GCSEs at grade A* - C including English and mathematics, is 48% (below the 2015 national average of 53.8%). Clearly there is much still to do to improve performance of pupils leaving secondary schools, if we are to achieve the objective in the LA's Education Covenant of all young people in the district leaving school ready for work and life.

Urgency

One of the recommendations set out in the original report was for the local authority to urgently review its process for identifying high priority schools, using the most recent set of performance data; once identified high risk/impact schools should be contacted urgently and a plan put in place to support the school over the immediate future.

For the last two years, the initial data-informed prioritisation process for Bradford schools has been completed by mid-July for primary schools and by the end of August for secondary schools and sixth forms: both processes are concluded within days of the most recent performance data being made available. This has enabled school improvement teams to focus attention quickly on the schools needing the most support depending on the school's particular situation: for example, some schools have improving results and are due an Ofsted inspection, some schools have two consecutive Requires Improvement Ofsted outcomes, some have declining results and are due an Ofsted inspection, some have suffered volatility in their leadership and management structures or have a new and, possibly inexperienced, Senior Leadership team. There are 21 primary schools Requiring Improvement due to be inspected during 2016: 12 by Christmas 2016. There are 12 secondary schools due to be inspected during this academic year: seven are on track to secure a Good or better Ofsted outcome with the remaining five continuing to require support.

LA maintained schools in the highest priority categories receive support from a named LA officer and a high performing partner school as well as a series of planned reviews and interventions, tailored to their circumstances. In addition, a series of additional intelligence gathering processes take place at each phase to identify additional foci for high-priority schools by key stage or pupil groups, to identify other schools needing additional support at one or more key stages and to identify schools that have exceeded expectations and would be in a position to

provide school-led support for other schools in the district.

Focus

The lessons learnt for the service from Professor Woods' review have meant that a shared focus on certain areas has become the priority for all teams within the service, regardless of its individual function. Ensuring that schools are challenged on the outcomes for individual groups of pupils, e.g. those eligible for FSM and thus attracting additional Pupil premium funding, at every level have been realised over the past two years, starting with the commissioning of the Pupil Premium and Closing the Gaps policy and strategy immediately following the initial review. Clearly schools have to be accountable for the additional monies that pupils attract.

The Early Years' school improvement service in 2015/16 commissioned analysis to investigate the relationships between outcomes in terms of GLD and the proportion of children eligible for Free School Meals (FSM) on a simple scatter plot. Lines marking the national averages for GLD and proportion of FSM pupils meant that it was immediately clear which 'quadrant' schools fell into: high FSM/high GLD; high FSM/low GLD; low FSM/high GLD; low FSM/low GLD. This meant that schools were able to identify their pupils' levels of disadvantage relative to other schools – with some surprises – and for officers to identify which schools could potentially offer support from the high performing quadrants to schools with poorer outcomes but with a similar level of disadvantage. The schools with low FSM and low GLD were judged to be particularly at risk. These schools were supported during the year, leading to improved performance in 2016: on average, schools improved by 10 percentage points year on year, compared with an average of four percentage points across Bradford. Each school targeted, supported and challenged has a case study focused on the best practice and have been shared with schools. A similar process is to take place during 2016/17.

Support

The highest performing local authorities in terms of schools' and pupils' performance have identified that appropriate, timely and focused support based on individual need is what will make the difference in terms of creating a self-supporting and improving system. The resources of local authorities as well as their role and responsibilities in school support and improvement have changed dramatically over the last six years: what used to be provided is no longer possible, nor preferable. Our focus, as an LA, is now to provide the support we can to high priority schools, and to recognise, as soon as possible, where a school and its pupils might be better served by joining a Multi Academy Trust (MAT).

Table 3: High priority primary schools in 2015/16

P3 or P4	Sept 2015	June 2016	Sept 2016
LA Maintained	52	47	42
Non-LA Maintained	14	19	8
All schools	66	66	50

Five high priority LA maintained schools converted to Academy status within the year

The process outlined above of quickly and efficiently identifying high-priority schools through the triangulation of performance data, officers' local sector intelligence and expertise and the level of resource available produced 52 high priority (P4 or P3) LA maintained primary schools in 2015/16. All schools identified as high priority over the year were supported by a combination of LA officers and other local schools, MATs etc. Some have been supported into Academy status and others continue to be supported by the LA. The secondary partnership has formalised its school to school support strategy and will broker support and challenge through 2016/17.

One of the most significant challenges faced by high priority, underperforming schools is the recruitment and retention of high quality teachers and senior leaders. Although the problem is not unique to Bradford, the LA has identified this as one of the strongest potential links in creating a self-sustaining support system in the gift of the LA to facilitate. Bradford commissioned a Recruitment and Retention manager who is charged with building the networks across the district. For example, one school identified has a very proactive approach to recruitment, working with a range of Initial Teacher Education (ITE) providers and has a good succession planning process for the development of all staff in their careers, including support staff into teaching. The Deputy Headteacher has developed great marketing resources and leads groups on the bus tours organised for teacher trainees that takes them around a selection of Bradford schools. The school was able to successfully recruit from the pool of NQTs and played a supportive role in the talent bank process.

Leverage

The nature of the leverage that Bradford can make use of in terms of improving schools' performance has changed dramatically over the years since Professor Woods completed his report in 2014. The government's policy on schools converting to Academy status when a school is deemed to be in Special Measures by Ofsted or when a Good or Outstanding school chooses to convert have meant that a number of Bradford schools have converted to Academy status, facilitated and supported by the LA. This has opened up the possibilities for partnership working, changing the nature of the leverage that the LA can exert, as well as by necessity restructuring the LA's accountability for schools in the district.

In September 2014 Bradford had 164 LA maintained schools and 38 non-LA maintained, since then 17 schools have converted to Academy status and one new school has opened (also one has closed). A further 24 schools are due to convert to Academy status within the autumn term. The academy sponsors with responsibility for schools at that point in the district numbered 15, there are now 21 MATs operating in the Bradford district.

Table 4: Number of LA and non-LA maintained schools 2014 and 2016

Phase	Sept 2014		Sept 2016		New free schools
	LA	Non LA	LA	Non LA	
Primary	136	19	128	29	0
Secondary/Through	15	18	9	24	1
Special	6	2	6	2	0
Other (AP, PRU)	7	0	7	0	0
Totals	164	38	150	55	-

Academies and free schools, in the main, belong to Multi Academy Trusts (MATs) although there are some standalone academies: all are responsible to the Department for Education (DfE), through the Regional Schools Commissioners (RSC).

The school improvement intervention role for non-LA maintained schools now rests with the RSC; however, in practice this is carried out in partnership with the LA and the MAT as well as other local partners. Bradford's primary partnership (BPIP), the Catholic Schools' Partnership (CSP) and secondary partnerships are to become the appropriate bodies through which decisions are made, commissioning reviews of school improvement as part of the prioritisation process, Pupil Premium reviews, safeguarding, governance and other audits, etc. In the future, the LA's role will evolve from leading partnerships to becoming a lead partner, alongside the RSC and other local partners to commission support and challenge to underperforming schools.

Pace

In the original report to the Executive in December 2014, the LA recognised that it had not acted quickly enough on a number of occasions in the past. Having recognised its limitations in the past, the service has put in place measures to promote working at pace, both within the service and with partners. For example, the majority of recommendations had been met within the two terms from the initial report and its first review in September 2015. The service has undergone a full review and restructure over the last few months and needs to 'hit the ground running' in terms of the planned changes based on the White Paper, Educational Excellence Everywhere, the changes to schools performance and accountability in 2016, including new floor and coasting schools standards, and a revised Ofsted framework from August 2016.

There are many examples of the service acting at a pace where it may not have been able so in the past, including the requirement to focus safeguarding our most vulnerable children and young people through the work of the Education Safeguarding Hub set up very recently. In addition, the conception, introduction and realisation of the six "hub" schools, Centres of Good Practice for New Arrivals, between September 2015 and Easter 2016 shows that, with the right intentions and focus, much can be done in a short space of time.

Within the 2015/16 academic year, Bradford used its intervention powers to give 10 Warning Notices to schools, five of which were Interim Executive Boards (IEBs). The five warning notices that didn't progress to an IEB were all completed in the year. Of the five IEBs, two are on-going and three have been disbanded: two because results showed sufficient improvement and one because the school converted to Academy status.

Impact

The impact of the review, the policies and strategies put in place by the LA is ultimately on the outcomes for children and young, measured by their performance as a cohort and within pupil groups, e.g. by ethnicity, FSM, gender, etc.,

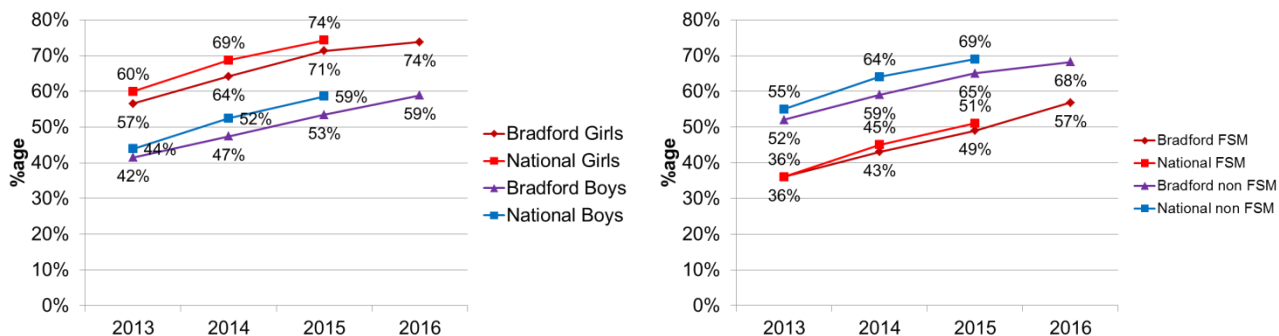
benchmarked with national, and by the Ofsted outcomes for schools. The reporting on these aspects is part of the Children’s Service Overview & Scrutiny process and will not be repeated in detail here. However, as an LA we were asked by Professor Woods whether ‘Bradford knows what Bradford knows’ and can it act on information quickly to bring about positive change.

As outlined above, Bradford has struggled to recruit and retain good teachers into its schools. The impact of putting in place the recruitment and retention manager has been very positive so far:

- 360 final year students attending Leeds and Bradford universities were taken on the bus tours of schools, aimed at showing the district’s schools and teaching in the best possible light. As of September 2016, 460 students across four universities have been identified and will tour around in the coming months.
- There were 112 trainee teachers targeted by the service in 2015/16, of which 90 were interviewed for the talent bank. There were 85 successful NQTs, securing permanent posts across 75 of the district’s schools.
- A large number of schools have changed headteacher over the last few years: the service has been instrumental in supporting new headteachers into their roles.

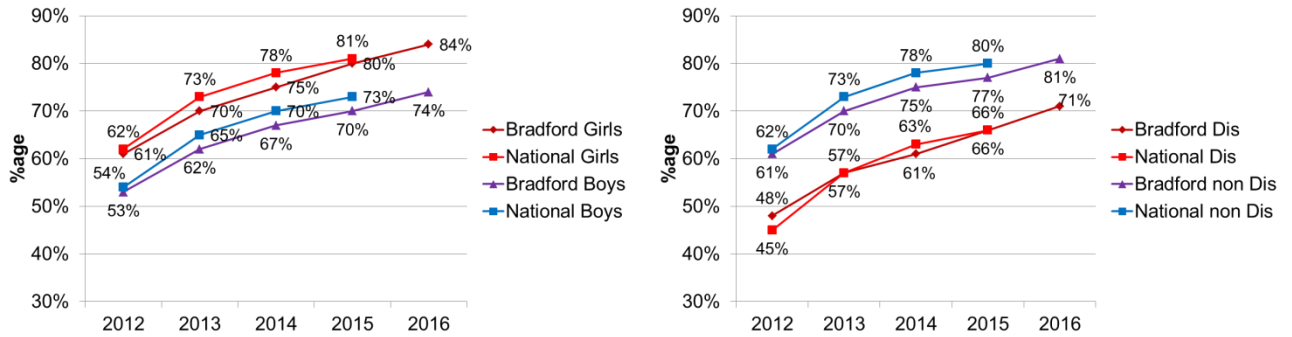
The main issue for Bradford’s primary schools in 2016/17 is reading at the end of KS2: 56% compared with 66% nationally. Whilst gaps have been narrowed in earlier key stages, e.g. Early Years, Phonics and KS1 (although direct year on year comparisons are difficult), there is much further work to do at KS2. The writing Teacher Assessment results were, however, just under the national average which gives schools a strong base to build from.

Chart 5 & 6: Narrowing the gaps at the Early Years Foundation Stage



The impact of the Early Years Language and Literacy programme, run in conjunction with the National Literacy Trust, through the Literacy Hub, and St Edmund’s Children’s Centre has been similar to the “quadrants” work outline above: the schools in the programme had a nine percentage points improvement (validated by external review) compared with the LA average. In addition, the gender gap and Free Schools Meal gap have both narrowed at the Early Years Foundation Stage.

Chart 7 & 8: Narrowing the gaps for Year 1 Phonics



Likewise the gap between Disadvantaged pupils and their non-Disadvantaged peers has narrowed for Year 1 pupils achieving the Phonics standard in 2016 although the gender gap has remained at 10%, with boys performing below girls on average.

It is more difficult to assess whether the gender, Disadvantaged and English as an Additional Language (EAL) gaps have narrowed at KS1 and KS2 because the new curriculum and assessments mean 2016 results are not directly comparable with previous years.

Table 2: Narrowing the gaps at Key Stage 2

RWM	2014 (% L4B+)	2015 (% L4B+)	2016 (% EXS)
Gender Gap % Bfd	-2	-3	-6
Gender Gap % Nat	-4	-3	Not yet available
Disadvantaged Gap % Bfd	-19	-21	-18
Disadvantaged Gap % Nat	-20	-19	Not yet available
EAL Gap % Bfd	-11	-10	-7
EAL Gap % Nat	-5	-5	-7

The original Professor Woods review was in response to the LA's school improvement inspection by Ofsted in 2014 which judged that the district did not have enough Good or Outstanding schools. The percentage of primary schools judged as Good or Outstanding by Ofsted improved in the academic year September 2015 to July 2016, from 64% to 73%. This narrowed the gap with national from -20% to -16%. For LA maintained schools 80% of schools were judged as Good or Outstanding in July, an increase of 14% within the year.

The picture at secondary phase is different. The percentage of secondary schools in Bradford judged as Good or Outstanding by Ofsted did not change between September 2015 and July 2016, remaining at 41%. The percentage of LA maintained schools did improve but this is because schools judged as Inadequate or Requires Improvement were supported to convert to Academy status within the year.

Sustainability

The shift from LA-led school improvement to a school-to-school improvement model with the LA as a partner has led to the LA refocusing the whole of the school improvement service; for example, the “Hub” schools for sharing best practice with other schools with pupils who are new to English have been refocused from more generalist support for EAL / BME pupils from the LA.

Similarly, the earlier identification of underperforming schools and the immediate use of effective and experienced leaders to offer support and challenge those schools resulted in a smaller number of primary schools being in the high priority category by July 2016.

As an LA, we draw on the expertise of successful leaders and MATs from other areas of the country, some of which are now academy sponsors of Bradford schools. This includes Wigan (Leading Learners), Wakefield (Wakefield City Academies Trust), Blackburn (Tauheedul) and Newcastle (Northern Education).

For example, in November 2015, 35 primary headteachers from Priority 1 (P1) and Priority 2 (P2) schools and five Achievement Officers (AOs) participated in the training entitled ‘How to effectively support and challenge primary schools needing improvement’ delivered by a National Leader in Education (NLE)/Executive Head from Wigan. This was done as part of the move towards a sector led improvement system. Consequently a booklet outlining the key principles for school to school support was produced by the LA to complement that produced by the Teaching School Alliances (TSAs).

In autumn 2015, all 52 LA maintained Priority 3 and 4 schools were offered the opportunity to work with a P1 or P2 school or take part in the regional Pathfinder programme targeting Requires Improvement schools: 36 schools took up the offer. Some of the school to school partnerships were brokered and funded by the TSAs within and outside of Bradford (Exceed, Birth to 19, Aspire, Learning Together in Wigan and Outwood Grange from Wakefield). Of these, 18 of this set of schools have moved up a priority level due to the improved leadership, effective school-to-school and increased capacity: this was evidenced by either improved pupil performance in 2016 and/or by securing a good Ofsted outcome during the academic (for those that were inspected). Of the remainder, 17 have kept the same priority level due to still being judged as requiring improvement and one has moved to a higher risk priority level due to limited leadership capacity.

3. OTHER CONSIDERATIONS

- 3.1 Bradford now has a school improvement model primarily based on school-to-school support, meaning the LAs’ role is shifting towards a sector-led model from how it has traditionally led the process and facilitated partnership working.
- 3.2 The White Paper “Educational Excellence Everywhere” published in March 2016 and due to be debated in parliament in the next session will have a significant effect on the role and responsibilities of the local authority and the implications for schools whose performance does not meet the ‘floor’ or ‘coasting’ schools standards.

- 3.3 How schools are held accountable for their performance changed in 2016 across all phases: Key Stage 1 and 2 results are now based on an expected standard assessment, Key Stage 4 results now look at average grades attained across English Baccalaureate subjects and Key Stage 5 results provide a more detailed assessment of attainment across academic and technical subjects. Progress at all key stages is now assessed using Value Added models: comparing a pupil's individual progress with that made by 'similar' pupils on average nationally.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1 As a result of developing a school-led system a reduction in the local authority teams associated with school improvement will be seen.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 5.1 None.

6. LEGAL APPRAISAL

- 6.1 The Local Authority has statutory duties to ensure that efficient education is available to meet the needs of the population of the area; ensure that its education functions are exercised with a view to promoting high standards ensuring fair access to opportunity for education and learning, and promote the fulfilment of learning potential; and secure that the provision of sufficient schools for providing primary and secondary education are available for its area.

- 6.2 Where a school is failing to provide adequate education it can be eligible for intervention by the Local Authority or the Secretary of State under the Education and Inspections Act 2006. A "coasting school" will be eligible for intervention when the new section 60B of the Education and Inspections Act 2006 comes into force. The term "coasting school" will be defined in future regulations. Local Authorities must have regard to the Schools Causing Concern statutory guidance. The guidance details the role of Local Authorities in delivering school improvement for maintained schools and academies. It also includes guidance on "coasting schools". If a school satisfies the definition of being a coasting school, the Regional Schools Commissioners will consider what interventions or actions are necessary to bring about sufficient improvement in those schools.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

Not applicable.

7.2 SUSTAINABILITY IMPLICATIONS

Not applicable.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

Not applicable.

7.4 COMMUNITY SAFETY IMPLICATIONS

Not applicable.

7.5 HUMAN RIGHTS ACT

Not applicable.

7.6 TRADE UNION

Not applicable.

7.7 WARD IMPLICATIONS

Not applicable.

8. NOT FOR PUBLICATION DOCUMENTS

8.1 None

9. OPTIONS

Not applicable.

10. RECOMMENDATIONS

10.1 That it be noted that, with the completion of the recommendations by Professor Woods this is the final report on his paper.

10.2 That further developments regarding school improvement will be reported through the Education Improvement Strategic Board and the Education Standards report.

11. APPENDICES

11.1 Appendix 1: Professor David Woods' review recommendations outstanding in 2016

12. BACKGROUND DOCUMENTS

12.1 [Summary of the review of the effectiveness of current arrangements to support school improvement in Bradford by Professor David Woods, CBE](#)

12.2 [Report to CYP Overview & Scrutiny Committee \(September 2015\): "Bradford review by Professor David Woods 29th and 30th September 2014 – one year on"](#)

Appendix 1: Recommendations outstanding in 2016

Recommendation 7:

Focus monitoring visits and quality assurance on these commitments ensuring joint practice development and joint accountability with the school and the governors including agreed, immediate actions being logged after each visit.

September 2016 update

This recommendation has been fully incorporated into the Early Years and Primary teams' process of planning, focusing and reporting on school visits. Quality Assurance of visits by Early Years' consultants (EYCs) and Achievement Officers is undertaken by their line managers, with further QA taking place on a sampled basis by Heads of Service.

In addition, all EYCs have been accompanied on visits by their line manager with QA of a number of key events and meetings they have held with service users, e.g. leaders and managers network meetings, as well as key stage moderation meetings held with schools and settings.

The primary achievement team's notes of visits record the impact of actions taken and the key action points/next steps arising. These are stored on the Service's system following being shared with schools, as a reference resource for reviews or inspections. They have also been QA by HMI; the exemplar notes are shared as a model of best practice with colleagues.

From a secondary perspective, most of this work has been undertaken by the Partnership rather than the LA: in the form of reviews, quality assurance and follow up. Where there have been high priorities to manage, notes of visit have recorded key action points arising etc. and are stored within the Service's files.

Recommendation 12:

Governing bodies should implement, with senior leaders, immediate actions as a result of monitoring visits, SSMG meetings and Partnership Reviews.

September 2016 update

Required actions are communicated to governors of maintained schools, evidenced for example by governing board agenda items. Governing boards are informed of the recommendations and outcomes of Partnership Reviews as a key element of information sharing and governors' action planning.

Recommendation 13:

With the LA seek to gain the best intelligence related to the questions – Does Bradford know what Bradford knows?

September 2016 update

Bradford knows its schools well and is able to provide a very thorough service in terms of data collection, analysis of performance at all key stages and online analytical tools. There has been a requirement, as a consequence of the school-to-school improvement model and the visit of Sir Michael Wilshaw in March 2016 focused on children missing in education in the district, to better focus the service in terms of specific groups of pupils, e.g. children not regularly attending school,

children whose families are recent arrivals from the EU, including but not limited to Roma families, etc.

For example, the LA now regularly brings together all officers responsible for performance analysis relating to Children’s Services to share best practice and engage with new models of sharing data to develop better intelligence.

In terms of schools’ performance, 2015/16 saw a focus on Phonics across Bradford primary schools, based on analysis that focused on schools where less than two thirds, i.e. less than 10% below national, of Year 1 pupils met the expected standard of Phonics decoding in 2015. Officers worked with schools to support each other, providing focused support based on the specific needs of groups of pupils and schools, e.g. high numbers of children with English as an Additional Language (EAL). Performance on the Phonics standard in 2016 has improved in the majority of the schools identified, helping to further narrow the gap with national.

Recommendation 17:

Encourage schools to write up case studies of excellent practice and the Partnerships, with the LA, should commit to annual publications of the best of these, showcasing the very best of Bradford’s education provision.

September 2016 update

The primary team has worked in close partnership with Bradford Primary Improvement Partnership (BPIP) and the primary schools to ensure best practice is shared at termly area meetings, HT briefings and through the production of research booklets – Maths in 2014-15 and Reading and Writing booklet in 2015-16. Handouts have also been produced by schools and shared at BPIP HT briefings and termly area meetings.

Over the last academic year the LA has commissioned a number of “Hub” schools: Centres of Good Practice for New Arrivals. The hubs were awarded the funding and status because of their expertise in supporting children who are New to English and their families in integrating into school life and supporting children towards reaching their full potential. The six partner hubs offer a range of support to neighbouring schools and settings in terms of teaching and learning.

Feedback and evaluation so far has been very encouraging. For example, the six hubs have worked with a further 32 schools in their first term of operation. They have also established links with the teaching training provision in Bradford colleges and universities so that the inclusive values and behaviours that underpin the work of the hubs become embedded in new teachers’ practice.

In terms of the secondary phase, limited progress has been made in writing case studies up owing to the academy agenda and more pressing issues about bringing in capacity to generate good practice to share. However, secondary schools continue to be signposted to schools that have strengths in aspects to promote improvement.

As of October 2016, 100% of the recommendations have been put into action and completed.

	Recommendation	Completed
1	Re-focus the remit of the Board on achieving its set priorities and reduce its membership to ensure executive and urgent action to drive school improvement.	By Sept 2015
2	Commission urgently a Pupil Premium and Closing Gaps policy and	By Sept 2015

	strategy.	
3	Consider the appointment of an independent Chair	By Sept 2015
4	Review the Board's communication strategy as to the new School Improvement Strategy to the Education Service, schools and settings, governing bodies and the wider community making this a high profile Bradford Challenge.	By Sept 2015
5	Re-examine the role and focus of Achievement Advisers and Consultants in terms of ACTIONS and IMPACT.	By Sept 2015
6	Specifically require Achievement Advisers to 'sign off' at the beginning of each academic year targets and predictions, the Raising Attainment Plan and the Pupil Premium policy and plan together with brokered support as required in conjunction with Governing bodies.	By Sept 2015
7	Focus monitoring visits and quality assurance on these commitments ensuring joint practice development and joint accountability with the school and its governors including agreed, immediate actions being logged after each visit.	By Oct 2016
8	The LA should prioritise its schools after each set of annual performance data so that at the start of the academic year the appropriate intervention and support can be made available.	By Sept 2015
9	After each SSMG meeting there should be a set of immediate actions agreed by the school and governors and monitored and supported by the Achievement Advisers.	By Sept 2015
10	The LA should review urgently its impact on Priority one schools over the last 2 years and adjust its practice in the light of its findings.	By Sept 2015
11	The SIG should consider whether it should work with OfSTED and the DfE Regional Commissioner on joint improvement activities and also whether its membership should be reduced to allow for executive action at a pace.	By Sept 2015
12	Governing bodies should implement with senior leaders immediate actions as a result of monitoring visits, SSMG meetings and Partnership Reviews.	By Oct 2016
13	With the LA seek to gain the best intelligence related to the questions – Does Bradford know what Bradford knows?	By Oct 2016
14	Further develop the peer review process so that schools respond urgently to the reports with a list of agreed, immediate actions.	By Sept 2015
15	Seek to identify the very best practice in Bradford's schools and setting by inviting responses on an agreed template which has been rigorously self-evaluated and externally validated (every school should contribute at least one area as a sign of commitment to this exercise).	By Sept 2015
16	Plan and co-ordinate excellence visits, establishing processes and protocols, where excellent practice has been verified. Ensure that there is follow up action from these visits.	By Sept 2015
17	Encourage schools to write up case studies of excellent practice and then the Partnerships, with the LA, should commit to annual publications of the best of these showcasing the very best of Bradford's education provision.	By Oct 2016

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Report of the Director of Children's Services to the meeting of the Executive Committee to be held on 11 October 2016.

Subject:

AB

Request to the Executive to consider the introduction of a policy for charging schools for the work associated with Academy Conversions.

Summary statement:

The number of maintained schools in the district converting to academies is rising and capacity for Council services such as Human Resources, Estates and Legal are extremely stretched. As a result, it is proposed that the Authority implements a charging policy.

Michael Jameson
Strategic Director
Childrens Services

Portfolio:

Education, Employment and Skills

Report Contact: Terry Davis
Strategic Manager Employment and Skills
Phone: (01274) 437170
E-mail: terry.davis@bradford.gov.uk

Overview & Scrutiny Area:

Childrens Services

1. SUMMARY

- 1.1 The number of maintained schools in the district converting to academies is rising and capacity for Council services such as HR, Estates and Legal are extremely stretched. As a result, it is proposed that the Authority implements a charging policy.

2. BACKGROUND

- 2.1 Academy Conversions form a key part of the Government's education policy. The Academies Act 2010 gave all maintained schools the opportunity to become academies. There are different circumstances and conditions under which schools become academies, some converting to enjoy greater freedoms and others required to convert with a sponsor in order to address performance concerns. The Government policy is to promote and encourage all schools to take up academy status.
- 2.2 When an academy order is made the Council is required to undertake a significant range of actions including managing property transfers, undertaking staff TUPE consultation and disclosure, dealing with pension and payroll arrangements, school budget matters, establishing new contracts and varying existing school contracts not least in relation to those schools established under PFI arrangements.
- 2.3 The number of academy conversions has risen dramatically over the past 12 months. Whereas in September 2015 there were 4 schools waiting for academy conversions, there are now 30 academy orders in place with schools waiting to convert, with more expected in the future:

	Schools waiting to convert to Academies				Converted Academies		
	Primary	Secondary	Special	TOTAL	Primary	Secondary	TOTAL
Sept 2016	24	5	1	30	9	5	14
Sept 2015	0	4	0	4	1	2	3

- 2.4 The conversion process needs to be resourced appropriately; costs vary case by case depending upon the level of complexity involved in each individual academy conversion particularly in regard to land and property legal issues associated with schools sites which are now community multi purpose sites or whether the conversions form part of a multi academy trust.
- 2.5 This work is placing demand upon in-house services, and with diminishing income to the Council and resources to deal with a growing number of conversion requests, the current situation is not sustainable. It is therefore important for the Council to secure resources needed to manage the conversion process more efficiently and effectively and to manage costs pressures on the Authority of more schools converting to become academies.

3. OTHER CONSIDERATIONS

- 3.1 Academy Trusts and or schools are allocated financial assistance by the DfE to support conversion costs. It is intended that the existing Scheme for Financing Schools would be the framework most suitable for charging schools for work carried out by the Council. DfE position is that where councils do impose charges, these must be reasonable and should not be for services they must provide.
- 3.2 Due to the increasing number of Academy conversions and to enable a policy to be drawn up without delay this report has been drafted urgently and has not been included on the forward plan.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1 The introduction of a charging policy would enable cost recovery of work associated with Academy Conversions. The current position is that there has not been a charge for this work. However, as conversions increase, and Council resources diminish, it is recommended that the Executive considers introducing a charging policy.
- 4.2 Other Local Authorities have already, or are in the process of introducing charging policies. There are some examples of charging policies which have enabled quicker conversions to take place due to the increased resource this change in policy allows.
- 4.3 There are varied models introduced by different Council's which include
- fixed cost charges with differentiated increases for complex/protracted conversions.
 - charges based on actual cost.
 - a contribution cost to cover the majority of council costs.
 - scales of costs based on a range of factors e.g. phase /size of school or whether a PFI school.
 - whether this is a new academy or a change in sponsor of an existing academy.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 5.1 There are risks to the rate of academy conversions if the introduction of this policy is not approved. There are also reputational risks for the Authority in its continued working relationship with the DfE and the RSC. This work essentially represents a "New Burden" and the continuing demand for requests to be facilitated is unsustainable. The introduction of a charging policy would increase the resources available to effect conversions.

6. LEGAL APPRAISAL

- 6.1 The Academies Act 2010 as amended by the Education Act 2011 is the principal legislation governing the establishment of academies and enables any educational institution to apply to the Secretary of State for conversion to an academy.

- 6.2 Amendments to the Act by the Education and Adoptions Act 2016 was intended to enable the Government to intervene more swiftly in failing schools particularly in a new category of school labelled “coasting schools” where such intervention is considered necessary.
- 6.3 The academy conversion process requires the local authority, the school and the academy trust to enter into and agree a number of legal documents to transfer school staff to the employment of the academy trust, to lease the school land including playing fields and to transfer contracts and school assets from the Council to the academy trust.
- 6.4 The Act requires the governing body and the local authority to take all reasonable steps to facilitate the conversion of a school where an academy order is made. Where the Secretary of State is proposing to enter into academy arrangements the duty extends on the local authority to facilitate the making of those arrangements.
- 6.5 The government white paper Educational Excellence Everywhere stated that financial assistance will continue to be available for academy projects, although it did not commit to the level of funding. In addition a MAT Growth Fund is available to support the foundation of new and developing multi- academy trust groups .There is also a new funding system called the Intervention Fund used to attract new sponsors and increase sponsor capacity. There is no separate funding made available for local authorities.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

None.

7.2 SUSTAINABILITY IMPLICATIONS

None.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

None.

7.4 COMMUNITY SAFETY IMPLICATIONS

None.

7.5 HUMAN RIGHTS ACT

None.

7.6 TRADE UNION

None.

7.7 WARD IMPLICATIONS

None.

**7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS
(for reports to Area Committees only)**

None.

8. NOT FOR PUBLICATION DOCUMENTS

None.

9. OPTIONS

- 9.1 (a) Not to approve the introduction of a charging policy for Academy conversions.

This option would maintain the status quo whereby the Council attempts to absorb the current workload and associated costs . This would place increasing pressure on already stretched internal resources.

- 9.2 (b) To approve the introduction of a charging policy for Academy Conversions.

This option would enable cost recovery and would build capacity within in – house departments.

10. RECOMMENDATIONS

- 10.1 That option b above is approved, to allow the introduction of a charging policy for Academy Conversions.

- 10.2 That the Strategic Director, Children’s Services is instructed to develop and implement a charging policy in consultation with the City Solicitor, the Director of Finance and the Portfolio Holder for Education, Employment and Skills.

11. APPENDICES

- 11.1 None.

12. BACKGROUND DOCUMENTS

- 12.1 None.

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