



The Planning Inspectorate

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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**

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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	dwellings 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.

<b>LEGAL REQUIREMENTS</b>	
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 judgements<sup>1</sup>.
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).

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<sup>1</sup> 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 regulations<sup>2</sup>, 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 &

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<sup>2</sup> 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 level<sup>3</sup>.
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,

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<sup>3</sup> 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 policy<sup>4</sup>.

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.

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<sup>4</sup> 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