

Bradford Local Plan

Core Strategy Examination Session Day Four

Matter 4A: Housing Requirement

Date: 10th March 2015

Venue: Victoria Hall, Saltaire

Key issue:

Has the Council undertaken its objective assessment of housing need in line with the latest national guidance and good practice (NPPF/PPG)

1. Council's Response

- 1.1. One of the key roles of the Core Strategy is to objectively assess and then plan for the need for new homes over the plan period in response to a variety of evidence including projected demographic change, market signals and likely levels of economic growth. The Council considers that it has met the requirements of the National Planning Policy Framework (NPPF) by making every effort to objectively identify then provide a strategic policy framework to meet the district's housing needs and respond positively to wider opportunities for growth (NPPF paragraph 17).
- 1.2. It has based its objective assessment on a range of evidence including 3 iterations of a Housing Requirement Study (EB028 – EB033) produced by consultants GVA and Edge Analytics and 2 iterations of a Strategic Housing Market Assessment (SHMA) (EB050 – EB053) produced by consultants Arc4. In combination these documents provide a wide but proportionate evidence base which accords with both the NPPF and the more detailed good practice guidance within the National Planning Policy Guidance (NPPG).
- 1.3. The Council has carefully considered the analysis within these evidence base documents along with representations made at each stage of the plan preparation process. The Core Strategy sets its housing target in line with the guidance within the latest iteration of those documents and this in turn means it reflects the best available evidence at this point in time. The Housing Requirement Studies in each case provide a range within which the annual housing target should be set and the target of 2,200 within the Core Strategy Publication Draft lies towards the upper end of that range. This reflects the Council's approach, in line with the NPPF, to plan positively to meet the district's needs but above all it reflects the importance to both reflect and support the growth and regeneration of the district's economy which is one of the Council's key corporate goals.

Question 4.1a

How has the Council undertaken an objective assessment of housing needs for Bradford, which is justified by robust and proportionate evidence and has been positively prepared, taking account of all the relevant factors, and does the Plan fully meet the objectively assessed needs for market and affordable housing in Bradford, along with any unmet housing requirements from neighbouring authorities,

2. Council's Response

- 2.1. The Council has commissioned evidence from consultants GVA and Edge Analytics to provide an independent and robust assessment of future housing need. Two housing requirement study reports were produced by these consultants in 2013, in each case basing the analysis and conclusions on the generation of a number of scenarios using the POPGROUP model. The study also included the analysis of a range of contextual information and indicators including transaction levels and house sales prices, affordability levels, vacancy, overcrowding and past rates of completions. The first report of February 2013 (EB028) utilised the then most up to date ONS 2010-based sub-national population projections (SNPP) and the DCLG 2008-based household projections. The update addendum report of August 2013 (EB032) utilised the subsequently issued interim 2011-based household projections. Both studies generated two core scenarios, one demographic led the other constrained by the

implied future size of the labour force as informed by the Yorkshire and Humber Regional Econometric Model (REM). Both studies provided a range from within which the objective assessment of need should be set.

- 2.2. A comparison of the outputs of these two studies was included within the Background Paper No 2 (SD016) and is produced again below for information and comparison (See Table 1). Also included below is the result of the further updated scenarios produced by Edge Analytics in 2014 (see Table 2) which utilised the subsequently issued 2012-based SNPP, updated REM jobs growth projections and recently released 2011 Census data.
- 2.3. The ultimate decision on the most reasonable and appropriate assessment of need clearly lies with the Council, however, both initial reports provided a steer on where within the range (as produced by the core scenarios) the assessment of need should be set. The first report (EB028) advocated setting a figure towards the upper end of the range which was framed by the two core scenarios. The upper figure was the one generated by the employment led scenario. The recommendation to set the housing requirement towards the upper end of the range therefore reflected the need to align with the Council's aspirations for jobs growth and regeneration. The second report suggested setting the housing requirement at the mid point between two iterations of the employment led scenario – the first iteration utilising the rates of household formation (headship rates) implied by the 2008-based household projections and the second by the lower rates of household formation implied by the interim 2011-based household projections. This mid point recommendation was a reasonable one given the stark differences in the trend periods on which those projections were based (one based on a period of better economic conditions and the other based on a period of recession).
- 2.4. The second report (EB0023) therefore indicated the potential use of a housing target well above the level which would otherwise be indicated by the demographic scenario alone. The Council considers that the approach taken in the addendum report was entirely reasonable for two reasons – firstly because it maintains the principle of setting and aligning housing provision with projections for future employment growth and secondly because it is clear that economic and housing market conditions are in a period of improvement and recovery and this will most probably result in higher levels of household formation than those which underpin the interim 2011-based household projections.
- 2.5. The results of the further revised scenarios produced by Edge Analytics in September 2014 are presented in Table 2. The Edge Analytics report incorporated the newly issued 2012-based SNPP and results from the 2011 Census. However, significant questions arise from the 2012-based SNPP, in particular, the assumed levels of international migration over the projection period. As highlighted in the Edge Analytics report, the assumed annual average level of international migration in the 2012-based SNPP for Bradford is lower than the historical data suggest, over both a 5-year and 10-year historical period.
- 2.6. Following the 2011 Census, the 2002–2010 mid-year population estimates were 'rebased' to align them with the 2011 mid-year population estimate. In Bradford's case, the mid-year population estimates were found to have *under*-estimated the level of growth population growth in Bradford over the 2001–2011 decade. The Office of National Statistics (ONS) has not explicitly attributed this mid-year population estimate adjustment to any one component of change. Instead, it has identified an additional 'unattributable population change' (UPC) component, suggesting it has not been able to accurately identify the source of the 2001–2011 under-count in Bradford.

2.7. The ONS has stated that no adjustment has been made to the 2012-based SNPP to take account of the UPC component¹. It is possible, therefore, that the 2012-based SNPP for Bradford will have under-estimated future levels of international migration and thus the overall future level of Bradford's population.

2.8. For these reasons, in addition to the previous core scenarios, the updated report by Edge Analytics included alternative trend-based scenarios using migration data from the last 5 and the last 10 years. The UPC component was included within the international migration assumptions, as this is the component with which it is most likely associated. For each scenario, Edge Analytics presents two alternative household-growth outcomes: one using the 2008-based household formation rates ('Option A') and the other the 2011-based rates ('Option B'). The average dwelling requirement or 'mid-point' is then presented for each scenario.

2.9. From Table 2 it can be seen that the proposed annual housing requirement of 2,200 dwellings lies within but at the upper end of the range produced.

Table 1: Bradford Housing Requirement Study 2013 – Comparison of Core Scenarios

| | SNPP Scenario – Initial Report (2008-based headship rates) | SNNP Scenario Addendum Report (Interim 2011-based headship rates) | Employment Led – Initial Report (2008-based headship rates) | Employment Led – Addendum Report (Interim 2011-based headship rates) |
|---|---|--|--|---|
| Households 2011 | 199,300 | 199,172 | 199,048 | 198,774 |
| Households 2028 | 235,778 | 227,155 | 241,381 | 228,605 |
| Household Change 2011-28 | 36,478 | 27,983 | 42,333 | 29,831 |
| Dwellings Required (3% vacancy assumed) | 37,572 | 28,822 | 43,603 | 32,064 |
| Net Annual Dwelling Requirement | 2,210 | 1,695 | 2,565 | 1,807 |

Table 2: Bradford Housing Requirement Study – Updated Analysis September 2014

| | SNPP Scenario (2012 Based) | | Employment Led Scenario (Updated REM) | | Migration (10 year) | |
|----------------------------------|--|--|--|--|--|--|
| | Option A (Interim 2011 based Household Projections) | Option B (2008 based household projections) | Option A (Interim 2011 based Household Projections) | Option B (2008 based household projections) | Option A (Interim 2011 based Household Projections) | Option B (2008 based household projections) |
| Household Change 2011-30 | 27,980 | 37,250 | 32,712 | 42,146 | 37,279 | 2,041 |
| Net Annual Dwelling Requirement* | 1,532 | 2,039 | 1,791 | 2,307 | 46,824 | 2,563 |
| (Vacancy Assumed - 2011 Census) | | | | | | |

¹ 2012-based Subnational Population Projections for England, Report on Unattributable Population Change, 20 January 2014, Office for National Statistics

| | SNPP Scenario (2012 Based) | Employment Led Scenario (Updated REM) | Migration |
|-------------------------------------|----------------------------|---------------------------------------|-----------|
| Average of Options A & B | 1,785 | 2,049 | 2,302 |

- 2.10. The Council considers that the plan is based upon, a reasonable balance of the two differing trends of house hold formation and the areas economic need and opportunities As such the Council believe the housing requirement is based upon robust and proportionate evidence and the Council has set its housing target at a level which aligns with projected economic growth and which will meet in full this objectively assessed need.
- 2.11. The Council can confirm that the Core Strategy is seeking to meet in full the objectively assessed need for market and affordable housing. Further information on the evidence and approach to affordable housing is contained in the Councils statement in response to Matter 4F.
- 2.12. The Council has outlined in its Duty to Cooperate Statement (SD006) and Background Paper No 1 (SD015) the extensive work and co-operation with adjoining local authorities and that none of those authorities are seeking or requiring Bradford to meet any of their housing needs.
- 2.13. The Leeds City Region has commissioned a number of reports to ensure consistent and robust methodology for assessing housing need across the region and to ensure that the resulting Local Plans are capable of supporting a boost to the housing supply and to ensure the ambitions set out in the Local Enterprise Partnership (LEP) Growth Deal and Strategic Economic Plan submitted to Government in March 2014 are supported.

Question 4.1a i.

The Plan proposes to provide at least 42,100 homes (2013-2030). What is the basis, justification, assumptions and methodology for the proposed level of housing provision, having regard to the supporting evidence (including the SHMA & SHLAA, Housing Requirement Study (August 2013 update), Housing Background Paper²), recent population/household projections (including the 2008/2011-based household projections and 2012 sub-national population projections), demographic change, migration, household formation rates, housing market area, key housing drivers, housing demand and market signals, the need for affordable housing and the relationship with the economic strategy, in line with the guidance in the NPPF (¶ 14, 17, 47-55; 159) and Planning Practice Guidance (ID: 2a/3)?

3. Council's Response

- 3.1. The housing requirement of 42,100 new homes for the plan period 2013-30 is comprised of a number of components as set out within Table HO1 of the Publication Draft. These are as follows:
- An annual requirement of 2,200 dwellings per annum for the period 2011-30 informed by the Housing Requirement Study produced by consultants GVA and Edge Analytics; this figure effectively reflects a significant uplift over and above

² Housing Background Paper 2 (February 2014); Examination Document (16)

- the pure demographic based projection to reflect expected jobs growth and to support the growth and regeneration of Bradford's economy;
- An additional allowance of 7,687 to reflect under provision against the development plan targets for 2004-11 and shortfall against the proposed 2200 target for the period 2011-13;
 - A reduction of 3000 to reflect the contribution from a reduction in the number of vacant homes within the district in line with the Council's strategy for tackling empty homes (ref PS/B001b(x) & PS/B001b(xi));
- 3.2. The assumptions underpinning the Housing Requirement Study are discussed within both Background Paper 2 (SD016) and the paragraphs 2.1 -2.11 above. The Housing Requirement Study has used the most up to date population and household projections in line with the guidance within the NPPG but have also analysed the uncertainties within those projections, other market signals such as over crowding, past completions and affordability, and the latest economic projections.
- 3.3. The backlog and shortfall allowance reflects the fact that the Housing Requirement Study only seeks to model household change between 2011 and 2030. Net housing completions during the period 2004-11 have been both below the plan based targets and below the levels of household growth over that period. There is therefore a danger that household formation has to some extent been constrained by the low level of completions. Contextual data on the levels of over crowding within part of the urban area – while not necessarily proving that this is the case – certainly provides added support for making an allowance for this backlog within the overall level of housing provision in the Core Strategy. The Council considers that this adjustment complies with the principles of the NPPF and in particular the NPPG, ID2a, paragraph 016 of which states:
- “The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.”*
- 3.4. The Housing Requirement Study has provided a detailed and robust assessment of the key drivers which underpin the projected need for new homes. The district has a relatively young age profile and this means that natural change is a major component of future population growth. Net international migration is also a key component but this has in the past, and continues to be projected in the future, to be partially counter balanced by net domestic migration out of Bradford to other parts of the UK.
- 3.5. The Council's SHMA and SHMA Update provide further analysis of demographic and housing market drivers. These documents also reveal that the district has a high degree of self containment with regards to migration moves and travel to work such that Bradford can be considered a single market area. Since the SHMA Update was produced census data on migration has indicated that 78% of moves are within the Bradford district which lies well above the 70% level at which single market areas are normally defined.
- 3.6. A net district wide affordable housing need for around 587 dwellings per annum is revealed by the SHMA Update and although house prices are highest within the Wharfedale sub area, the greatest quantum of future affordable housing need are

projected to be within the Bradford urban area. A combination of the concentration of affordable housing need within the urban area and more challenging viability conditions which do not allow for high percentage affordable housing requirements in these areas further substantiates both the relatively high level at which the district's housing requirement has been set and also the housing distribution which is focused on the Regional City.

- 3.7. In setting its housing targets the Council has also considered other evidence most notably land supply data from the SHLAA. This shows that while challenging, the need for new homes can and therefore should be met within the district. Land supply data suggests the need for a significant contribution from green belt to meet the district wide housing target. The Council's Growth Assessment (EB037) has provided evidence that green belt releases can be made in a range of locations which are both sustainable and where such releases would not undermine the local or strategic functioning of the green belt.

Question 4.1a ii.

What is the current and future 5, 10 & 15-year housing land supply position, including existing commitments, future proposed provision, allowance for windfalls, phasing, balance between brownfield and greenfield sites, and provision identified in the latest SHLAA; and how will the proposed housing provision be effectively delivered?

4. Council's Response

- 4.1. The District's potential land supply is detailed within the SHLAA Update of May 2013 (EB049). It shows a supply over the 17 year trajectory of 49,858 dwellings to 2029 and a residual supply 3850 dwellings from sites not yet 'built out' during the period to 2029. These dwellings could be brought forward into the trajectory if earlier start dates or slightly higher annual completions rates were assumed.
- 4.2. A further update to the SHLAA is nearing completion. This latest SHLAA update has added a number of sites to the SHLAA site count related to:
- new planning consents,
 - additional site submissions from land owners and developers
 - sites stemming from the Growth Assessment (green belt)
 - a reduction in the qualifying site size threshold from 6 units to 5 units

The Council has completed initial site appraisals and has carried out amendments to those assessments based on comments received and feedback from the SHLAA Working Group members. Discussions on a number of sites where the Council disagrees with Working Group members comments is ongoing. The revised data as it stands is presented in the Council's position statements relating to Policies HO2 and HO3 under matters 4B and 4C.

- 4.3. The latest position on 5 year land supply is included within the 2013 SHLAA Update. It suggests a 5 year land requirement of 18,241 dwellings and this includes in full the backlog in provision over the period to 2013 (the Sedgefield method). Deliverable supply totalled 8,554 which equates to 46.9% of the requirement or 2.3 years supply. The current update of the SHLAA will provide a re-worked figure. Preliminary indications are that although the supply may have slightly increased this will be offset by a further years undersupply and the new Government requirement to include a 20%

buffer within the calculations. It is therefore unlikely that the headline supply figure of 2.3 years will be much changed when the work on the third SHLAA is completed.

- 4.4. The Council considers that the production of the Core Strategy will provide a significant contribution to securing a 5 year land supply by providing a clear strategic framework for the production of the allocations elements of the Local Plan.
- 4.5. Data and information regarding existing commitments is included within the Council's Annual Monitoring Report. This indicates a total supply from commitments of 9,627 dwellings (but note this does not assess deliverability).
- 4.6. Brownfield land targets have been set within the Core Strategy by reference to the target for each settlement or sub area and the deliverable and developable land supply within that area taken from the SHLAA. Of the total supply of 53,708 dwellings within the SHLAA Update it was estimated that 18,172 were on brownfield land. This figure is may be slightly higher within the third SHLAA, in particular due to increased potential capacity within Bradford City Centre.
- 4.7. With regard to windfalls the Council are seeking to ensure that land is allocated in full to meet the requirement for 42,100 new homes. The housing requirement has therefore not been adjusted or reduced to include a windfall allowance. This will give added certainty and confidence that the required housing quantum will be delivered. Windfall development has made a significant contribution to completions in recent years however this is unlikely to be sustained at the same level into the future. Past windfall rates largely reflected the fact that there has been no new Local plan in the district for 10 years. The new Local Plan, informed by the SHLAA will be picking up and then allocating deliverable opportunities for the recycling of land and buildings and thus reducing the scope for windfalls.
- 4.8. The Council has set out its approach to housing delivery within Appendix 7 of the Core Strategy Publication Draft. Key elements include:
 - The production of the Area Action Plans for Bradford City Centre and the Shipley and Canal Road Corridor;
 - Progressing the Holme Wood Urban Extension;
 - Preparation of SPD's and site development briefs;
 - Bringing forward land from the Council's land assets;
 - Direct development of new affordable housing;
 - Working in partnership with the HHCA and RSL partners to deliver sites particularly within the main urban areas under the Affordable Homes Programme;
 - Working at a LCR level to secure investment to unlock sites where constrained by infrastructure problems;

Question 4.1 a iii

How does the Plan address the need for a 5/20% buffer to 5-year housing land supply, as required by the NPPF (¶ 47) to significantly boost housing supply, and how does it address previous shortfalls in housing provision, both during and before the current Plan period?

5. Council's Response

- 5.1. The Council's SHLAA has on each occasion used the Sedgefield approach so that the required quantum fully reflects backlog. The revised SHLAA currently nearing

completion will also include a 20% buffer in line with the NPPG guidance which was introduced in the period following preparation of the second SHLAA

- 5.2. The Core Strategy has set its housing requirement at a level well above that which would be implied by using the 2012-based SNPP alone. The resulting provision for 42,100 new homes also includes a backlog component of over 7,000 dwellings. Together these measures will provide a land supply which will enable the 5 year requirement to be met even with the application of the 20% buffer.

Question 4a iv

How does the Plan address previous backlogs in housing provision?

6. Council's Response

- 6.1. First of all the Council believes that it is right in principle for the plan to consider and then plan for any recent unmet need. The Plan therefore includes an allowance of 7,687 dwellings as detailed in table HO1 on page 157 of the Core Strategy Publication Draft.
- 6.2. To test whether previous supply may have fallen short of need it is advisable to assess a range of demographic and market indicators. Within Bradford there is clear evidence of under provision by virtue of the size of social housing waiting lists and level of over crowding within parts of the urban area. However, the most telling indicator is that the growth in households since 2004 (which the interim 2011-based household projections estimate to be 18,238 over the period 2004-13) has far exceeded net housing completions of just 11,053 – a deficit of 7,185. The plan based backlog, which is a better indicator since it took account of a wider range of factors than pure demographic projections is therefore fairly closely aligned to the proposed allowance for backlog.

Question 4a v

Is the allowance for vacant dwellings fully justified with evidence?

7. Council's Response

- 7.1. The Council considers that the allowance for vacant homes is both reasonable and justified by evidence. The Council has a delivery strategy, policies and proposals to achieve the 3000 reduction (ref PS/B001b(x), PS/B001b/(x1) and Policy HO10).
- 7.2. Significant progress is already being made on the issue. The importance of this issue and the progress which is already being made is indicated by a range of stories within the local media over the last 2 years. On the 2nd June 2014 the Bradford Telegraph and Argus reported that figures showed that only three local authority areas in the country had seen a larger annual reduction in long term vacant homes than Bradford. The numbers had been cut by 785 over a 12 month period from 4,766 in 2012 to 3,981 in 2013. It also reported on success stories such as the restoration of Emmfield Villas in Heaton. On the second of December 2014 the Bradford Telegraph and Argus reported on the support the Council was giving to the charitable organisation the Empty Homes Agency in promoting empty homes week. It reported that the latest figures showed a total of 7,852 empty properties within the district which although high was a significant reduction of the figure of the previous year which was over 10,000.

- 7.3. The Council notes that while certain objectors such as the HBF do not consider that evidence has been provided to justify the proposed allowance and likelihood that those will be achieved it should be noted that this is not a view shared by CEG Land Promotions Ltd, Persimmon Homes (West Yorkshire, Barratt David Wilson Homes - Yorkshire West Division, or Redrow Homes (rep no 489 & 495)

Question 4a vi

How will the Plan fully meet the need for affordable housing (c.587 units/year)?

8. Council's Response

- 8.1 The latest evidence in the SHMA Update 2013 indicates an annual net shortfall of 587 affordable homes across the District. To meet the identified need for affordable housing the Council will aim to ensure that 20 to 25% of the total housing delivery is affordable housing. The overall affordable target will be achieved by range of measures including utilising funding sources to support the delivery of affordable homes, maximising opportunities offered by council owned land and through developer contributions as set out in the answers to key Issue 4.5 Policy HO11 Affordable Housing.
- 8.2 Affordable housing targets for developer contributions are the main mechanism by which the Local Plan can have an influence on the provision of affordable housing. Not all of the identified affordable housing need will be met by developer contributions, as other methods of delivery such as grant funded schemes also play an important role in the delivery of affordable housing. For instance the council has secured funding for 766 affordable homes in the district over the next three years through the Government's Affordable Homes Programme (AHP) 2015-18.

Question 4b

Has the overall housing provision level been set too high or too low?

9. Council's Response

- 9.1. The Council considers that the housing provision has been set at the right level and reflects the evidence provided within the Housing Requirement Study. It has been based on reasonable assumptions – for example taking the mid point between projections resulting from the two most recently issued sets of household projections. It has assessed a range of other contextual data, the most relevant market signals being the levels of over crowding within the district's urban areas and has included two elements of uplift, one to provide for unmet need due to the low levels of completions in recent years and the second an uplift so that the housing requirement aligns with the economic growth and jobs growth projections within the Yorkshire and Humber Regional Econometric Model.
- 9.2. Many of the objections suggesting that the housing requirement is too high appear to relate to views of the potential environmental impacts of such a level of house building, loss of green belt and infrastructure issues. However none of these factors in the Council's view warrant setting the target at a lower level. The Council considers that while challenging the housing requirement can be delivered in a sustainable way and that there are opportunities for green belt change in accessible locations.
- 9.3. Objections seeking a higher housing target have in the main been received from developers and have been based on differences in the detailed methodology advocated, in particular how household formation rates should be addressed. The

Council are confident that the approach advocated by Edge Analytics is both reasonable and appropriate and conforms with national guidance and good practice..

Question 4c

What alternative levels of housing provision have been considered, having regard to any significant and demonstrable adverse impacts of proposing increased levels of housing provision within Bradford; what would be the basis and justification for any alternative level of housing provision?

10. Council's Response

10.1. A number of differing levels of housing provision have been put forward and consulted upon during the different stages of plan preparation depending on the evidence available at the time and the status of the now revoked Yorkshire and Humber Regional Spatial Strategy (RSS). In both the Further Engagement Draft and Publication Draft the Council has considered alternatives based on the annual housing requirement range revealed in the different iterations of the Housing Requirement Study. It has also considered options related to the other components of the housing requirement calculation, namely whether to include a windfall allowance and whether to include an allowance for a backlog in provision and unmet need. The Council considers that the conclusions it has reached and the level of provision proposed is justified when compared to the alternatives, is based on proportionate and robust evidence, will as required by the NPPF deliver a significant boost to housing supply in the district, and demonstrates that the Plan has been positively prepared.

Question 4d

How does the objective assessment of housing needs relate to the employment and jobs strategy?

11. Council's Response

- 11.1. The Council accepts that it is important that there is consistent approach to assumptions on jobs creation within the Core Strategy. Its position is that the Yorkshire and Humber Regional Econometric Model (REM) provides the best estimate of the likely level of growth which will occur in the district and these REM projections should underpin the different parts of the Core Strategy. The latest iteration of the Housing Requirement Study utilises the June 2014 run of the REM which indicates an annual increase of 1,604 jobs which equates to 28,867 new jobs over the plan period. This is a very high level of growth but one which is considered achievable.
- 11.2. The economy chapter contains an analysis of the work undertaken within the Council's Employment Land Review and also provides contextual data which shows relatively high levels of both unemployment and worklessness within the district. The Council is committed to seeing both regeneration and to seeing this regeneration reduce these levels of underemployment and worklessness and this is the reason that an alternative and higher aspirational annual jobs creation figure was included within Policy EC2. In retrospect it was an error to include this figure within the policy not just because of the need to align jobs creation figures with those utilised within the assessment of housing need but because the higher jobs growth number is probably unachievable. The Council will therefore be proposing a main modification to ensure that Policy EC2 reflects the employment growth figure assumed within the housing requirement study.
- 11.3. The basis for the jobs figures contained in policy EC2 is set out in background paper 3 (SD018) and also considered in the Councils Statement in response to matter 5.

Question 4e

Does Policy HO1 effectively address cross-boundary housing issues, including the relationship with the Leeds City Region, in line with the NPPF (178-181), and has it taken into account the housing and economic strategies, plans, priorities and projects of adjoining local authorities and other bodies/agencies?

12. Council's Response

- 12.1. The Council considers that the proposals for housing provision fully reflect the work carried out at Leeds City Region level and have emerged from a through process of co-operation and coordination.
- 12.2. Further details on work on the strategic housing issues can be found in the Duty to Cooperate Statement (SD006).