

Bradford District Local Plan

Core Strategy Examination Session Day Six

Matter 5: Economy & Jobs

Date: 12th March 2015

Venue: Victoria Hall, Saltaire

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?

Response

- 1.1 The rational and background to the economic strategy and Core Strategy policies is contained with the supporting text with further detail contained in the Background Paper 3, Economy and Jobs, (SD018). This strategy has been informed through an understanding of the many issues related to Bradford's local economy and the influence of current national, strategic and local policy guidance. It is based upon an analysis of the District's prevalent economic conditions through various evidence gathering studies undertaken in recent years. It sets out possible scenarios that may address and improve economic performance and also create new jobs for a young, growing population. The document provides estimates for the employment land required to accommodate potential new investment and presents a spatial strategy for its future distribution. It sets out a strategy for the future management of the Council's portfolio of employment land and buildings through the planning management system. Finally, it recognises the importance of the District's city and town centres as significant drivers in its economic regeneration and sets out a process to sustain and enhance their vitality and performance.
- 1.2 The detailed information used to inform the approach is contained principally in the following studies and documents:
 - Bradford District Employment Land Review and Update (EB027)
 - Local Economic Assessment (PS/B001b xiv)
 - Leeds City Region Strategic Economic Plan (PS/B001b xv)
- 1.3 The background document begins with an introduction to the local and strategic context of Bradford. It then sets out the process of engagement with the District's stakeholders to establish the terms of reference for the task of formulating a strategy to plan for future economic growth.
- 1.4 Section 3 of the background paper sets the context for future growth. It briefly describes the economic conditions that prevail within the District and how the local economy has performed in recent years. It identifies the areas where there is potential for future growth as well as the challenges.
- 1.5 Section 4 sets out the basis for a sound and effective economic strategy drawing from NPPF, the Leeds City Region Local Enterprise Partnership (LEP), Bradford District Economic Strategy and central government initiatives.

- 1.6 Section 5 then undertakes an in depth analysis of the District's economy, linking national performance to the current economic conditions found within the District. The 'Understanding Bradford District Report provides a comprehensive analysis of Bradford District bringing together a range of evidence and intelligence from a variety of sources. It builds on the former 'Bradford District Local Economic Assessment' and highlights the key drivers that shape the current position of the District and its future opportunities and challenges. It is designed to inform work on prioritisation as well as providing accurate and reliable analysis to the District's stakeholders. It provides a broad understanding of the local economy and the economic, social and environmental factors that impact on economic growth in Bradford District.
- 1.7 The Council also produced an 'Employment Land Review' which also provided an assessment of the economic structure of the District related to jobs growth, to the current supply of employment land in the District and to the need for new sites to support the growing sectors of Bradford's local economy. The Background Paper in Section 6 further examines the future demand for jobs in the District over the plan period and using projections from the Regional Econometric Model (REM), makes further indicative assessments of the employment land requirement and the optimum location for these sites. This spatial strategy is presented in Section 7.
- 1.8 The strategy for identifying a future supply of employment land is therefore related to maintaining and supporting the central economic axis which runs through the District. This stretches from Keighley in the north, through Airedale, Bradford urban area with its interface with Leeds, the City Centre and the motorway corridor in Bradford South. There are also business linkages to be made with Craven to the north-west and to the Leeds-Bradford International Airport. It is these areas which will provide the focus for new employment opportunities. The strategy is the provision of a varied employment land portfolio with a choice of size and type of sites together with the safeguarding of existing strategic sites that meet the requirements of the main growth sectors. The economic strategy is interwoven with the planning strategy and is based upon a credible evidence portfolio and on national and regional guidance.

Issue 5.1

Policy EC1 – Creating a Successful and Competitive Economy:

- a. **Is there sufficient evidence to justify the criteria and requirements for investment and planning decisions to deliver the particular economic benefits, as set out in the policy?**
- b. **Is the economic strategy appropriate, justified, effective, positively prepared, soundly based and consistent with the Leeds City Region LEP's economic growth strategy?**
- c. **Is the approach in line with national policy (NPPF/PPG)?**

- d. **Does the policy give sufficient preference to supporting the rural economy, including agricultural and rural businesses, and to the tourism economy?**

Response

Part a)

- 2.1 Policy EC1 is very much an overarching policy that brings together the various mechanisms that will help lead to the economic well being of the District. It sets the context for the more specific policies which follow as well as reflecting the Strategic core policies set out earlier in the plan. The policy is underpinned by a range of strategies and evidence including the 'Regional Economic Strategy 2006-2015, Bradford Local Economic Assessment, Understanding Bradford Report and Bradford Retail and Leisure Study.

Part b)

- 2.2 The economic strategy is outlined in Background Paper 3, Economy and Jobs. It is consistent with the Leeds City Region Growth Strategy. The Leeds City Region Local Enterprise Partnership Plan was published in April 2012 and is a five year strategic plan incorporating 4 strategic priorities. These are:

- unlocking the growth potential of business and enterprise
- enabling a flexible, skilled workforce
- facilitating a low carbon economy
- creating the environment for growth

- 2.3 The plan states:

“The LEP will lead a cross-sector, balanced approach to economic growth, and will build on the unique combination of city region assets to unlock the potential of our economy, businesses and workforce. In doing so, the LEP will seek to achieve GVA growth, enhance support and develop market opportunities where the growth potential is greatest and shape these opportunities to increase job creation across the wider economy, whilst working to decrease our carbon emissions.’ Through economic growth, the specific target is an increase in employment rate with the aim of returning to the pre-recession rate by 2016 by creating in the order of 60,000 jobs. In ‘Planning for Prosperity’, the Core Strategy directly aligns with this objective.”

Part c)

- 2.4 Section 4 of the background paper undertakes an analysis of the requirements of the National Planning Policy and how the key factors should be addressed in drawing up a local plan. The principle factors are to

- set out a clear economic vision and strategy

- set criteria, or identify strategic sites,
 - support existing business sectors
 - plan positively for clusters or networks of knowledge driven, creative or high technology industries;
 - identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
 - facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.
- 2.5 The NPPF goes on to include - insuring the vitality of town centres, planning for rural areas and planning for business. All of these factors are addressed through the background paper and are clearly reflected in the fourteen sub divisions of the policy.

Part d)

- 2.6 The policy, although not specific or set out as a directive, does in part M, 'support diversification and sustainability of agricultural and rural businesses'. Further, in part N it supports, 'A wide range of initiatives to ensure more diverse, competitive and successful economies in the rural areas of Bradford District'. The tourism economy is specifically addressed in parts F and J as an important contributor to the local economy through the city centre cultural sector and also as a non business sector.

Issue 5.2

Policy EC2 – Supporting Business and Job Creation:

- a. **What is the basis for the proposed delivery of at least 2,897 jobs per year; is it justified by evidence and is it effective, deliverable and consistent with the latest national guidance (NPPF/PPG)?**
- b. **What is the relationship between the delivery of 2,897 jobs per year and the housing target supporting some 1,600 jobs/year?**
- c. **How will this number of jobs actually be created and delivered?**

Response

Part a)

- 3.1 The demand for jobs is discussed in detail in section 6.1 of the background paper. The 2014 economic trend in the REM indicates a growth of around 28,800 jobs over the plan period, approximately 1600 jobs per annum. However, it can be calculated that the actual jobs need for the plan period is much greater.
- 3.2 In order to attain full levels of employment in the District (providing jobs for everyone), the target number of jobs that would need to be created by 2030 is calculated as the projected increase in the number of working age population in employment (27,800) together with the

projected number of claimants in total (76,762) which gives a total demand of 104,562 new jobs. However, achieving this degree of full employment is generally accepted as being unattainable. The figure includes those claimants who, for various reasons, are not actively pursuing jobs, are incapacitated or find it more advantageous in remaining as benefit claimants.

- 3.3 Because of this, in its calculation of jobs need in the District, the Core Strategy uses only the Job Seekers Allowance figure. This represents those unemployed who are actively pursuing jobs. The jobs target figure therefore comprises the increase in the number of working age population anticipated to be in employment at the end of the plan period (27,800) together with those projected to be on JSA, (21,464) which gives a new jobs demand of 49,264. This equates to 2897 new jobs that need to be created annually in all the sectors of the economy.
- 3.4 This figure is purely an aspiration and shown in the policy only as an indicator of the level of social deprivation that exists in the District and indeed it is likely that delivery of the higher jobs number is probably unachievable. The core strategy is not specifically planning for this number of jobs but would support initiatives and economic developments that help address this problem. The plan cannot create jobs or indeed plan for jobs numbers but can only provide the better economic conditions that would help stimulate jobs growth.
- 3.5 If the inspector considers this aspect of the policy to be unclear or unsound, the Council would support a change where the specific introductory sentence which relates to jobs numbers is omitted. Alternatively the figure could be revised to align with the jobs number used in housing modelling based on the REM which are considered deliverable (see response to b below).

Part b)

- 3.6 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.
- 3.7 As stated above in 5.2.a, the figure of 2897 is purely an aspiration and shown in the employment policy only as an indicator of the level of social deprivation that exists in the District and indeed it is likely that delivery of the higher jobs number is probably unachievable. The core strategy is not specifically planning for this number of jobs but would support initiatives and economic developments that help address this problem. The Council would support a change to Policy E2 if it provides more clarity.

Part c)

- 3.8 As stated above in response to (a), the figure of 2897 jobs is considered unachievable. Furthermore, the plan cannot create jobs or effectively plan for specific jobs numbers but can only provide the better economic conditions that would help stimulate jobs growth. The jobs are delivered through policies or initiatives which help with regeneration and economic development or land and sites which attract new investment. These include policies which maintain the vitality of centres, protect existing employment uses and employment land in good locations and protecting such sites from other uses.
- 3.9 The REM estimates growth in a number of economic sectors and decline in others. The growth industries as detailed in the latest REM include administration, civil engineering, computing and information, construction, finance, transport, media, professional services, real estate, and telecommunications. Many of these are B1 type activities and largely based in town and district centre locations. Based on jobs numbers, broad calculations can be made on the extent of the accommodation needed for these activities and the potential land take required. Where some operations are industrial or warehouse based (B2 and B8), similar calculations based on occupation rates are feasible leading to estimates of employment land need across the district.
- 3.10 For some growth sectors identified in the REM, the land requirement cannot be calculated in this way. These include retail, education, health, social services, agriculture, mineral extraction etc. Nevertheless these activities are a source of employment for a large part of the working population.

Issue 5.3

Policy EC3 – Employment Land Requirement:

- a. **What is the basis and justification for the employment land requirement for 135ha of employment land, is this effective and deliverable, and is it consistent with the latest national guidance (NPPF/PPG)?**
- b. **What is the basis and justification for the proposed distribution of employment land to the specific areas listed and the sources of supply identified, including the areas of search for high quality employment locations?**
- c. **Has the policy considered the detailed impact of employment land provision on particular communities, including Wharfedale?**
- d. **Has the policy properly considered the impact on roads and traffic congestion (including M602 and junctions), accessibility, the need to use brownfield land, infrastructure requirements, the environment, and the need to balance housing with employment land provision?**

Response

Part a)

- 4.1 The National Planning Policy Framework (NPPF) relating to economic development and ultimately provision of employment land is analysed in detail in Section 4 of Background Paper 3. The NPPF recognises that the purpose of planning is to achieve sustainable development through economic, social and environmental dimensions. The economic role in this respect is in contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. Plans should set out a clear strategy for allocating sufficient land which is suitable for development, taking account of the needs of the business communities. . Planning should encourage sustainable growth and to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of the 21st century. In drawing up local plans, local planning authorities should identify strategic sites, for local and inward investment to meet anticipated needs over the plan period.
- 4.2 Section 5 of the Background Paper, the Economic Evidence Base, presents the studies and analyses that have been undertaken to establish employment land requirement for the District as an ongoing process. As part of the Employment Land Review (EB026) and its update (EB027), there have been a number of calculations completed using the REM. However, the projections produced by the REM and the Employment Land Review are based largely on trend based modelling of how the economy might perform in future years. In this respect it is questionable whether they are wholly complete and accurate assessments of jobs growth and related land need. The REM projections are extremely sensitive to small fluctuations in the performance of the local economy. With the recent trends in the economy, from buoyancy to recession and then followed by slow growth, the projected outturns have been particularly volatile and have varied widely. Nevertheless they provide broad indicators as to the general level of employment land required to sustain the districts economic growth. In 2007 the ELR calculated a requirement of 214 hectares. Following the recession the projected figure was comparatively low at 61 hectares. In 2014 it had risen to 146 hectares.
- 4.3 With such significant variations, the model is used only to provide a general picture of performance in the local economy rather than a definitive calculation of employment land requirement. As an alternative, the trends in take up of land provided by the Council's annual monitoring process gives a clearer perspective on employment land demand for Bradford District. It demonstrates how the industrial property and investment market performs in Bradford through a range of contrasting economic circumstances. For this reason, the future demand calculation is based on recent development trends.
- 4.4 General take-up of employment land in the District has been monitored as an annual total since 1993. Up until March 2013 the total take up of allocated employment land has been 258.7 hectares, a yearly average

of 12.8 hectares. Development after-use has been monitored since 2001 by Use Class and by location, providing a better analysis of economic performance District wide. Between July 2001 and March 2013, the total amount of land developed for employment purposes under 'Use Classes' B1, B2 and B8 has been 105.8 hectares, an annual average of 9 hectares. During this period, the economy has emerged from the 1991 recession, through the economic peak of 2007/8 and also from the double dip recession of 2009/10. Given the wide range of economic cycles attained, this period provides a reasonable basis for future projection of employment land requirement. Extending forward the average amount of land developed for B class uses of 9.0 hectares to 15 years (the Plan period), this gives a total requirement of 135 hectares. However, this allocated land does not include the anticipated jobs growth in the retail, health and education and service sectors because these uses are usually planned around specific local service needs and local population changes.

Part b)

- 4.5 The approach to the distribution of employment land is found in Section 7 of Background Paper 3.
- 4.6 As of 1 April 2013 there are approximately 114.8 hectares of employment land with the benefit of established planning backing, identified within the District. Although this figure represents a large part of the estimated employment land requirement for the plan period, it does not necessarily provide the optimum supply. The majority of the sites are located sporadically across the District, are of inadequate sizes or they are better suited for other uses. It is important therefore that the proposed 135 hectares of employment land will provide a range of size and type of sites to reset this imbalance. The analysis of the development potential of the sites from a market perspective in 2007 forms an appendix to the Employment Land Review and it concluded that many of the sites in the current supply were considered to be developable at some point in the plan period and worthy of retention subject to the overall scale of need and spatial strategy to be adopted.
- 4.7 The Employment Land Review also presented a broad spatial strategy for the development of the supply of employment land in the District and this has been taken forward into the Core Strategy. Based on an analysis of labour market flows and industry make-up, five functional economic areas have been identified within the District as part of the Bradford Local Economic Assessment. Each has a distinctive economic space with different characteristics, influences and flows. The five areas are Wharfedale, Airedale, the Pennine Hills, City of Bradford and Bradford South.

1. Bradford Urban Area

The City of Bradford main urban area is currently the main location for employment in the District and includes the greater majority of the District's major employers. There are clusters of the general and traditional industries located on the periphery of the City Centre, mainly on the north eastern and southern areas of the City. The urban area

contains most of the allocated employment sites in the Replacement Unitary Development Plan (RUDP) which will provide the initial trawl for future consideration. Bradford South has been the main focus for industrial development in recent years and most of the previously allocated sites have now been taken up. Local entrepreneurs and investors have expressed a preference for this part of Bradford due to its proximity to the motorway infrastructure and hence, logistics and distribution industries are well suited to this location. Area Action plans are currently being prepared for Bradford City Centre and the Shipley and Canal Road Corridor and these may provide evidence of future demand for specific types of employment sites. Elsewhere in the urban area, large sites accessible to the highway and which can accommodate large scale mixed inward investment including distribution operations are also required.

2. Bradford City Centre Regeneration

The City Centre, at the heart of the Bradford City functional economic area is the key economic driver for the District. This is the main location for office uses which are dispersed around the City Centre together with the retail and leisure and service sectors which are also important economic drivers and employment providers. Key steps for regeneration have commenced including assembly of land, a commercial strategy and preparation of business cases. Grade A office accommodation is a particular priority.

3. Airedale and the Pennine Villages

As identified in Bradford 2020 Vision, Airedale has always been, and remains, a place for employment and living. It forms a broad corridor that runs through the heart of Bradford District between Bradford City Centre to the South and Wharfedale to the North. Its influence extends beyond the District, being a vital economic component of the Leeds City Region. It is classed as a major employment corridor focused on high-tech companies and digital communications. The Airedale Masterplan is focused on the economy so that it continues to deliver benefits to local people. It seeks to deliver realistic and practical solutions that will benefit businesses, support wider regeneration and stimulate economic growth in a creative connected corridor. A key part of this strategy is to provide for and support the development of key employment sites and the main towns are recognised as potential centres for increased economic activity. It is in these locations that sites will be identified through the later Allocations process. The Airedale Strategy also identified Esholt treatment works as an opportunity to release a large area of brownfield land of strategic importance, to create a research and development led technology business park. For the spatial distribution of employment land, the Pennine villages have been included with Airedale because a significant number of the residents travel to Airedale to work rather than to Bradford.

4. Leeds Bradford Corridor

Only nine miles apart, Leeds and Bradford's economic relationship has been defined as interdependent. This relationship creates opportunities for co-operation in delivery including joint marketing opportunities and shared approaches to inward investment and

development. The Leeds and Bradford International Airport epitomises this link and provides a stimulus for economic growth to the north of the Bradford urban area. Bradford also has a reciprocal two way travel to work relationship with Leeds with similar numbers of commuters travelling between the two Districts and the economic synergy between Leeds and Bradford has the potential to stimulate greater market activity. There is ongoing collaboration between the two districts to foster this approach.

5 Wharfedale

Ilkley is one of the Districts principal towns with its public administrative, cultural, retail, tourism and leisure functions and close connectivity to both Leeds and Bradford and is therefore a focus for new development. Ilkley has attracted a degree of economic growth in recent years. Only one small allocated employment site in Ilkley remains undeveloped mainly as a result of some physical constraints. There are no alternative sites available in Wharfedale yet there is apparent demand for sites for small and medium enterprises and for small service, business and finance industries.

6. Green Belt Locations

The three strategic locations identified for future employment growth in Policy EC3 of the Core Strategy currently lie within the green belt as defined in the District's Replacement Unitary Development Plan. Development proposals will therefore require specific changes to the green belt boundary as exceptional circumstances. Those circumstances which have led the Council to propose the development of land in the green belt at the three broad locations arise from the need to provide additional jobs in the District through economic growth and inward investment. The results of the 'Employment Land Review' suggest that some green belt deletions may be required to deliver the necessary employment growth over the plan period. Whilst it is not only the quantity of employment land supply that is important to maintain economic development, it is the quality of the supply, in the right locations, to attract inward investment and provide local jobs for areas with high levels of deprivation. It is also the need to improve the profile of the supply to meet the needs of growth sectors within the economy particularly logistics in south Bradford and digital clusters and technology industries in Airedale

- 4.8 The strategy for identifying a future supply of employment land is therefore related to maintaining and supporting the central economic axis which runs through the District. This stretches from Keighley in the north, through Airedale, Bradford urban area with its interface with Leeds, the City Centre and the motorway corridor in Bradford South. There are also business linkages to be made with Craven to the north-west and to the Leeds-Bradford International Airport. It is these areas which will provide the focus for new employment opportunities and the detailed findings of the ongoing Area Action Plans and Local Plan documents will help inform the Allocations DPD on the distribution of new sites and determine their sizes and locations. The distribution of the 135 hectares of employment land in the Core Strategy is currently determined by population levels in the economic quadrants and allocated at this stage on a pro rata basis. The planned requirement

for 135 hectares of employment land will be partly met from the current supply of sites with established planning backing. Additional supply will be required and provided through new allocations across the District. The strategy is the provision of a varied employment land portfolio with a choice of size and type of sites together with the safeguarding of existing strategic sites that meet the requirements of the main growth sectors.

Part c)

- 4.9 The strategy for the spatial distribution of employment land has been discussed under (b) above and the impact of employment on particular communities has been a consideration. The approach in Wharfedale also reflects the hierarchical position of Ilkley as a Principal Town under Policy SC4 and related employment policies including SC1-SC5. The delivery of new employment opportunities is also a factor in the sub area policies including those for Wharfedale, Airedale, and also the South Pennine Towns and Villages.

Part d)

- 4.10 The approach to Spatial Development in the district includes planned requirement for 135 ha of employment land which will be distributed as 100 hectares within the City of Bradford, 30 hectares in the Airedale corridor and 5hectares in the Wharfedale corridor. This suggests that in the forthcoming Allocations DPD, employment sites will be concentrated within the existing urban areas and along transport corridors. This also broadly reflects the approach to the distribution of housing with the biggest concentration being within the Regional City of Bradford.
- 4.11 The issues of traffic congestion and pressure points have been addressed through the work undertaken within the District Wide Transport Study (EB023) where specific corridors for further study and intervention have been identified. Section 7 of the District Wide Transport Study focuses on the Preferred Option for spatial development in the district, investigates the likely transport impacts of the future developments and identifies 10 key transport corridors in the district that will be expected to carry increased transport demand due to the future preferred option developments. Policies to address these issues along with infrastructure requirements are considered within the Sub-area policies and addressed within the Local Infrastructure Plan (EB044), along with other plans including the WY+TF and the Local Transport Plan.

Issue 5.4

Policy EC4 – Sustainable Economic Growth:

- a. **Is the approach to assessing proposals in terms of sustainable economic development, including the criteria and requirements set out, consideration of proposals for alternative development on employment land, identifying Strategic Employment Zones and requiring BREEAM standards to be met, effective, deliverable and consistent with the latest national guidance (NPPF/PPG)?**

- b. Is the approach to protecting existing employment sites, including the key employment areas and sites identified and the criteria for permitting alternative uses, appropriate, justified, effective, soundly based and consistent with national guidance (NPPF/PPG)?**
- c. Does the policy consider accessibility, viability, regeneration and infrastructure requirements?**
- d. Does the policy give sufficient support for agricultural and rural businesses?**

Response

Part a)

- 5.1 The methodology for development management of economic investment projects and growth as set out in the nine criteria relating to policy EC4 are both effective and deliverable in that it helps manage the existing industrial stock in the District alongside the allocation of new employment land in the Allocations DPD. The range of mechanisms are compliant with the policies set out in NPPF which seek to achieve sustainable development.

Part b)

- 5.2 The existing stock of industrial land, including the key employment areas across the District, provides a large source of employment for the District's residents. The underlying economic policy for the provision of new jobs is based on retaining the current businesses within the District and providing new opportunities to account for new jobs. There is also a stock of older and cheaper premises which provide an element of choice for those lower value business enterprises. It is important to retain this resource, particularly in sustainable, mixed use locations. Many of these sites are vulnerable to higher value end uses, particularly housing. Land and buildings which are currently in use or were last used for business purposes will therefore be protected for business use. Changes from business use will only be determined by consideration of a range of criteria including location, quality of buildings, layout, accessibility, adjacent land uses, functional redundancy, market significance and environmental impacts. Only, in these limited circumstances, where it can be demonstrated to the satisfaction of the Council that a site is no longer suitable for such use, the Council may allow a change to other uses.
- 5.3 The protection of industrial land and buildings is compliant with NPPF in that it is proactive in meeting the development needs of business. It also provides certainty to landowners and investors. With reference to paragraph 21, it is supportive of existing business sectors, taking into account whether they are expanding or contracting. Although the NPPF in paragraph 22 advises that LPA's should avoid the long term protection of sites allocated for employment use, there is appropriate flexibility within the policy for developers to secure a change of land use by presenting the evidence which would demonstrate exceptional circumstances. In practice, investment in economic development projects often proceeds at a much slower pace than other sectors such

as housing or retail, the need for choice in employment opportunities should be retained for the life of the plan.

Part c)

- 5.4 Accessibility standards relating to employment are contained within Appendix 3 of the plan and these would be applied as part of the policy mechanism of development management.
- 5.5 An updated Viability Assessment has been undertaken for the policy (Ref EB/046).
- 5.6 Regeneration is central to the regional and local economic strategies which provide part of the evidence base supporting policy.
- 5.7 Infrastructure implications are considered within the Council's Local Infrastructure Plan. (Ref EB/044).

Part d)

- 5.8 Support for agricultural and rural businesses is contained within Criterion G of Policy EC4. The importance of the rural industries is also recognised in Background paper 3, paragraph 8.1.14. Two thirds of the District is rural, accounts for 9% of the population and provides 3.9% of the districts jobs. The sector mix is similar to that in the urban areas. However, national analysis of business insolvencies has shown that businesses in market towns and larger villages have suffered more during the last recession than in urban areas. Notwithstanding the significance of green belt protection, it is important that support is given to this sector which EC4 (G) strives to do and taken alongside paragraph 28 of the National Planning Policy Guidance, support is clearly evident.

Issue 5.5

Policy EC5 – City, Town, District and Local Centres:

- a. **Does Policy EC5 provide an appropriate, effective and soundly based framework for establishing the hierarchy of retail centres in Bradford and for maintaining and enhancing the roles, functions, viability and vitality of the City, Town, District and Local Centres, including the locational and other criteria, which is justified with evidence and consistent with national policy?**
- b. **Is there sufficient evidence to justify the proposed hierarchy of centres?**
- c. **Should the policy or accompanying text indicate the capacity for additional town centre and retail development in the main towns and service centres, having regard to the Retail & Leisure Studies and NPPF (¶ 23); and should the boundaries of town centres and primary shopping areas be defined in this Plan?**

- d. Are the thresholds for impact assessments and sequential assessments justified by evidence, and is the approach of the policy effective, positively prepared, soundly based and consistent with national guidance (NPF/PPG)?**

Response

Part a)

- 6.1 In line with the National Planning Policy Framework paragraph 23 - 27, Policy EC5 seeks to ensure the continued vitality of town centres beyond just retail. The policy defines a hierarchy of centres and sets local threshold when assessing the impact of planning application for retail, leisure and office development in an edge of centre or out of centre locations. The Council has undertaken vitality and viability health checks of retail centres as part of the Bradford District Retail & Leisure Study, 2008 and the Bradford District Retail & Leisure Study Update, 2013 (EB034). The most up to date evidence (EB034) confirms that the majority of retail centres remain vital and viable centres.
- 6.2 The Council is planning positively to maintain and enhance the roles, functions vitality and viability of City, Town, District and Local Centres through Policy EC5. Continued regeneration of existing city and town centres across Bradford District is a Council priority as highlighted in the Bradford Community Strategy 2011-2014 (PS/B001b/1). This approach has facilitated significant investment in Bradford city centre through Westfield and Meyer Bergman The Broadway Bradford Shopping Centre, Keighley town centre through Stainsby Grange's Worth Valley Shopping Centre scheme, convenience retail investment in Bingley town centre, and more recently in Gillingham district centre. Policy EC5 will therefore support town centre regeneration programmes in order to create a prosperous district.
- 6.3 Policy EC5 provides an appropriate, effective and soundly based framework for establishing the hierarchy of retail centres in Bradford and for maintaining and enhancing the roles, functions, viability and vitality of the City, Town, District and Local Centres, including the locational and other criteria, which is justified with evidence and consistent with national policy.

Part b)

- 6.4 Policy EC5 establishes a network and hierarchy of centres (city centre, town centres, district centres and local centres) that is resilient to anticipated future economic changes. The Council has been testing the hierarchy of centres through the Retail & Leisure Study, 2008 and the Retail & Leisure Study Update, 2013 (EB034). It should be noted that the Retail & Leisure Study Update, 2013 (EB034) reviewed the hierarchy of centres identified in the Bradford District Core Strategy

Further Engagement Draft (Policy EC5, October 2011). The vitality and viability health check analysis by WYG, acting a retail consultants on behalf of the Council, see Appendix 1 of the Bradford District Retail & Leisure study Update, 2013 (EB036) has also focused on an assessment of the performance of the seven district and 47 local centres in Bradford, as outlined in the Core Strategy Further Engagement Draft report (Policy EC5, October 2011).

- 6.5 A comprehensive and detailed evidence base has been produced by WYG, acting on behalf of the Council, with site visits conducted to each of the centres. WYG has also undertaken a review of those centres which were de-listed from the retail hierarchy, in order to determine whether these should still be allocated as centres. Paragraph 11.03 – 11.10 of the Bradford District Retail & Leisure Study Update, 2013 (EB034) provides the evidence and justification for the proposed network and hierarchy of centres.
- 6.6 There is sufficient evidence through the Bradford District Retail Study (2008) and Bradford District Retail Study update, 2013 (EB034) to justify the proposed hierarchy of centres.

Part c)

- 6.7 The policy and/or accompanying text could indicate the capacity for additional town centre and retail development in the main towns and service centres. However, the Council believes that this capacity information is regularly changing due to fluid economic data on expenditure growth, population estimates and other variables (Special Forms of Trading-SFT, floorspace efficiencies) and change annually and therefore to commit to capacity figures at one point in time is likely to be restrictive and therefore any references to future capacity should be directed to the most up to date retail and leisure study, this provides a degree of flexibility and allows the figures to be revised every two years. It is also important to note that the latest Bradford District Retail & Leisure Study Update, 2013 (EB034) confirms that once planned investments are allowed for in defined centres (as well as other locations) there is no identified capacity in the short to medium term beyond these planning commitments, even after considering the enhancement of market share for Bradford city centre to allow for the Westfield and Meyer Bergman The Broadway Shopping Centre development. The Council is committed to maintaining up to date Retail & Leisure Studies over the plan period which will be made publicly available in order to provide capacity information in order to inform planning decisions, future regeneration priorities and investment decisions.
- 6.8 With regard to boundaries of town centres and primary shopping areas, the Retail & Leisure Study Update, 2013 (EB034) does make recommendations in paragraph 6.20 - 6.22, 11.11 and 11.18 (EB034) and Appendix 3 and Appendix 9 (EB036) for nominal amendments to town centre boundaries.

- 6.9 The boundaries of town centres and primary shopping areas will be defined through the Bradford City Centre AAP and Shipley & Canal Road corridor AAP DPDs (Publication Draft to be presented to Full Council in June 2015) and the Site Allocations DPD (Public Consultation on Issues and Options in August 2015).

Part d)

- 6.10 The Council considers that it is appropriate to identify locally set thresholds for the scale of edge of centre and out of centre developments which should be subject to an impact assessment. The Bradford District Retail & Leisure Study, 2013, paragraph 11.19 – 11.22 (EB034) recommended a range of thresholds for the Bradford district depending upon which centre the development applies to.
- 6.11 For a centre the size of Bradford city centre, performing the role that it does, Policy EC5 states that that development proposals providing greater than 1,500 sq.m gross floorspace for town centre uses in an edge or out-of-centre location should be the subject of an impact assessment.
- 6.12 The proposed thresholds at town (1,000 sqm gross floorspace), district (500 sqm gross floorspace) and Local centre (200 sqm gross floorspace) level as set out in Policy EC5 are considered to reflect the relatively small size of some of the centres at the lower end of the retail hierarchy and their consequent potential susceptibility to alternative 'edge' or 'out-of-centre' provision.
- 6.13 Policy EC5 advocates a tiered approach whereby the threshold applied to planning applications at the edge of centre and out of centre locations varies in relation to the role and function of the particular centre. The thresholds for impact assessments and sequential assessments in Policy EC5 are justified by evidence and have been tested through public consultation on the Core Strategy Publication Draft. The approach of Policy EC5 is effective, positively prepared, soundly based and consistent with NPPF paragraph 26.