

Bradford Local Plan – Bradford City Centre Area Action Plan DPD

Duty to Cooperate Statement

April 2016

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1. Leeds City Region Statement of Cooperation for Local Planning
2. Draft Bradford City Centre AAP Leeds City Region Duty to cooperate strategic issues table (September 2014)
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1. Introduction

1.1 The overarching priority for national planning policy (NPPF) is to deliver long term sustainable growth, ensuring that councils positively take into account the three pillars of sustainable development – economic, environmental and social - in their local plans. Many social, environmental and economic issues can only be effectively addressed over a number of local authority administrative boundaries. This is because people and businesses do not confine their activities to one council area. For example:

- employees may live in one area and work in another
- retail development may attract customers from across a wide catchment area
- people may travel to visit tourist attractions, leisure facilities or sporting venues

1.2 Similarly, from an environmental perspective:

- residents in some areas may consume water and power that has travelled hundreds of miles
- surface water run-off in one location may present a flooding hazard to communities further 'downstream'
- water and air pollution may have a damaging impact on environmental assets some distance away.

1.3 It is important that in drawing up Local Plans Local Planning Authorities recognise cross boundary strategic planning relationships and ensure that they properly understood and addressed.

1.4 The Regional Spatial Strategy (RSS) for Yorkshire and the Humber (adopted May 2008) provided the strategic context for the preparation of Local Plans in the Region. The work undertaken on the Waste Management DPD has been predicated on the need to both implement and align with the policies and strategies outlined in the RSS.

1.5 As part of the Governments planning reforms the Regional Spatial Strategy was removed from being part of the statutory development plan in the Localism Act. In its place the government introduced a new 'Duty to Cooperate' in order to ensure Local Plans dealt effectively with strategic cross boundary issues.

1.6 This Statement sets out the Councils approach to strategic planning and how it has undertaken the 'Duty to Cooperate' and how the work on the Bradford City Centre AAP has met this Legal duty prior to submission and informed the approach of the plan as submitted. Section 2 sets out the legal and regulatory background to the duty. Section 3 sets out the strategic context including the strategic geography and the approaches to strategic planning focusing on the

approach agreed in the Leeds City Region. Section 4 sets out the background for each of the substantive strategic issues. This documents the development of the approach, key relationships, evidence and outcomes.

2.0 Duty to Cooperate

- 2.1 From 2004 Regional Assemblies and Leaders Boards (from 2009) were responsible for strategic planning which was done through regional strategies. In November 2011, the Localism Act signalled the end of regional strategies which were officially revoked in 2013.
- 2.2 Following revocation of the regional strategies in England (outside London), strategic planning is now the responsibility of unitary, district or borough councils. Authorities are expected to address strategic issues in local plans and demonstrate how this has been managed through the '**duty to co-operate**' set out in Section 110 of the Localism Act (link below) and amplified in Paragraphs 178-181 of the National Planning Policy Framework (NPPF) and in the National Planning Practice Guidance (NPPG).
- 2.3 Section 110 of the Localism Act (link below) sets out the '**duty to co-operate**'. This applies to all local planning authorities, in England as well as specified other public bodies. The duty:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council
 - requires that councils set out planning policies to address such issues
 - requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies
 - requires councils to consider joint approaches to plan making where appropriate.
- 2.4 The NPPF (Paragraph 156) sets out the strategic issues where co-operation might be appropriate. Paragraphs 178-181 give further guidance on 'planning strategically across local boundaries', and highlight the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either joint planning policies or informal strategies such as infrastructure and investment plans. Further guidance on how the **duty to co-operate** should be applied in local planning is included in the National Planning Practice Guidance (NPPG).
- 2.5 The public bodies to which the Duty also applies include:

- Environment Agency
- Historic England
- Natural England
- Mayor of London
- Civil Aviation Authority
- Homes and Communities Agency
- Clinical Commissioning Groups
- National Health Service Commissioning Board
- Office of Rail Regulation
- Highways England
- Transport for London
- Integrated Transport Authorities
- Highway Authorities
- Marine Management Organisation

2.6 These bodies are required to co-operate with councils on issues of common concern to develop sound local plans.

2.7 As Local Enterprise Partnerships (LEPs) are not defined by statute, they are **not** covered by the '**duty to cooperate**'. However, LEPs are identified in the regulations as bodies that those covered by duty 'should have regard to' when preparing local plans and other related activities. Their role in supporting local authorities in plan preparation, particularly in developing the evidence base, is also highlighted in NPPF (Paragraph 160). The role of the Leeds City Region LEP is set out below.

2.8 Local Nature Partnerships (LNPs) are also prescribed in the regulations as bodies which local authorities 'should have regard to' given their role in the management of natural environmental assets, supporting biodiversity and, in particular, identifying Nature Improvement Areas. They are relatively new partnerships and have evolved from recommendations in the Natural Environment White Paper. Bradford is part of two Local Nature Partnerships – the South Pennines LNP and the Yorkshire West LNP which are at an early stage of development. The Yorkshire West LNP is currently developing an approach for responding to area plans and a framework for engaging partners and other LNP's in this work. Bradford will continue to engage with this process as it develops.

3.0 Strategic Context

Strategic Geography

3.1 The portrait below sets out the overview of the key strategic spatial issues which are relevant to the Bradford City Centre AAP DPD.

Strategic Location

- 3.2 The District is a key Bradford is a large metropolitan authority which covers approximately 370 sq km (143 sq miles) and forms one of the five districts within the West Yorkshire conurbation. The District is located within the Leeds City Region.

Figure 1 Leeds City Region Local Authorities

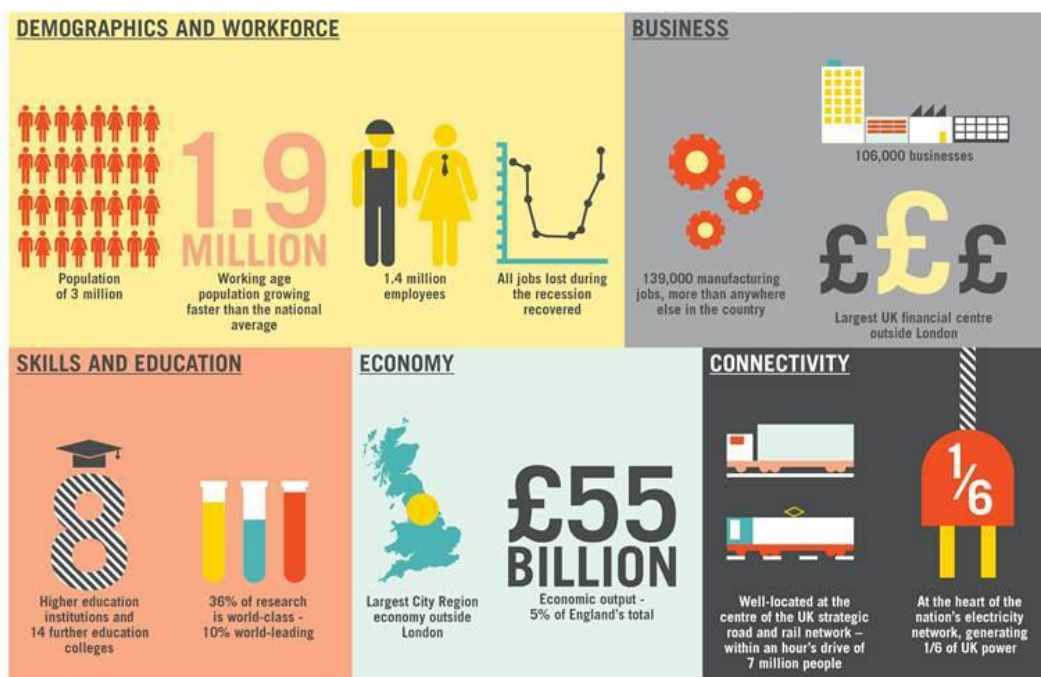


Leeds City Region

- 3.3 Leeds City Region is a diverse and polycentric economy. It covers a large geographical area, from the densest urban settlements to National Parks, and from some of the most prosperous neighbourhoods in the UK to many of the poorest.
- 3.4 Leeds City Region is the biggest of the core city region economies. It has an annual output of £55bn represents 5% of the English total. It has 106,000 businesses including world leading companies, 3 million residents and a workforce of 1.4m. Eight Higher Education institutions (one of which is in the District) and 14 Further Education Colleges (two of which are in the District) are based in LCR, home to a student population of around 230,000.

Figure 2 Leeds City Region Profile

OUR ECONOMIC ASSETS



(Source; LCR SEP 2014)

- 3.5 In 2011, the LCR published an overarching LEP Plan, setting out a vision for the City Region. This approach was refined in the 2013 Investment Plan to include more detail on its key spatial priorities for investment in connectivity, housing and regeneration to support economic growth across the City Region. The LEP Plan and the Investment Plan together formed the basis for the further development of ideas presented in the Strategic Economic Plan submitted to government in March 2014 in support of its Growth Deal. See Appendix 3 for SEP Self-Assessment with regard to alignment with the AAP.
- 3.6 The SEP is a long term plan to transform the economy of the Leeds City Region. It is designed 'to provide the foundations for growth, aligning our plans with those of public and private sector partners and with government for maximum impact' (SEP Part A, page 3).
- 3.7 The SEP has two purposes:
- A growth plan - how best to use public and other funds, together with devolved powers, to promote growth, based on a strong and clear analysis of the local economy and the barriers and opportunities that it faces;

- An implementation and delivery plan - detailed proposals and information on projects / programmes, funding, management, monitoring and evaluation.

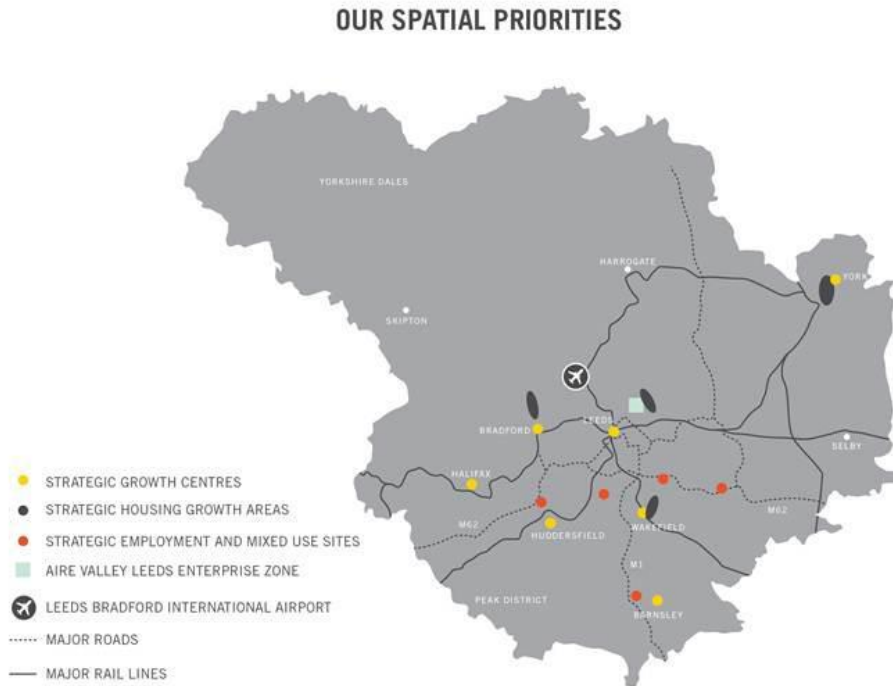
3.8 The SEP vision is that over the next decade and beyond it aims to:

- enable vibrant private sector growth, based on innovation and exports;
- create a NEET-free City Region, with more and better jobs, and the skilled and flexible local workforce to sustain them;
- become a lean, resource efficient economy underpinned by a 21st century energy infrastructure;
- build a 21st century physical and digital infrastructure that enables us to reach our growth potential;
- and we will make the most of the opportunities presented by HS2 – not just the economic gains from this step change in connectivity, but also the regeneration of towns and cities across the City Region, and the jobs, new skills and business opportunities it will bring.

3.9 Connectivity and improvements to transport are a key element of the SEP and subsequent Growth Deal.

3.10 The LEP has established three categories of spatial priorities where either the growth opportunities or the level of market failure is of City Region significance: **strategic growth centres; strategic housing growth areas; and strategic employment and mixed use sites**. These are summarised in the map below.

Figure 3 Leeds City Region Spatial Priorities



(Source; LCR SEP 2014)

- 3.11 The growth centres of regional significance are the city and town **centres of Bradford**, Barnsley, Wakefield, Huddersfield, Leeds, York and Halifax, alongside the Aire Valley Leeds Enterprise Zone.
- 3.12 Housing developments, both small and large, will take place in across Leeds City Region. However, the SEP concentrates only on the largest proposed housing developments, contained within our Strategic Housing Growth Programme, that are close to delivery and present the greatest investment opportunities. These include **Bradford-Shipley (Canal Road Corridor)**.
- 3.13 Additionally, the SEP has identified a number of other major development proposals that are progressing and will combine easy motorway and public transport access with proximity to towns and labour markets. The closest one to Bradford is Cooper Bridge – a strategic employment site in Kirklees between Brighouse and Mirfield, close to the M62 (J25) and with potential focus on manufacturing and engineering.
- 3.14 In July 2012 a ‘City Deal’ was agreed with government to boost jobs and growth, with Leeds City Region

- 3.15 The Deal gives Leeds and its partner Councils greater control over spending and decision-making to ensure interventions are in line with what our economy needs.
- 3.16 Work is currently underway on delivering the City Deal agreement, with the following projects and programmes already established in particular to support infrastructure improvements:
- 10 year £183m allocation of devolved major transport scheme funding to West Yorkshire and York
 - Pooling of business rates for West Yorkshire, York and Harrogate
 - £420m secured in 20 year deal through our [Local Growth Deal](#) to create the West Yorkshire plus Transport Fund envisaged in our City Deal
- 3.17 The Local Growth Deal extends the funding and powers already established through our City Deal to create jobs and begin delivering the ambitious agenda for growth outlined in the Strategic Economic Plan.
- 3.18 The Bradford Metropolitan District plays a major role in the Leeds City Region and beyond due to its size of population, and economy, proximity to other key centres, transport links and connectivity as well as its significant countryside and tourism offer.
- 3.19 These characteristics and what they mean for strategic planning are explored further below.
- 3.20 The Bradford Metropolitan District is characterised by a mixture of urban and rural areas with distinctive character and attractive landscapes. The topography of Bradford means most of the industrial and residential development is in the south of the district and along the valley bottoms, with the majority of the population living in the urban centres of Bradford and within the freestanding settlements of Keighley, Bingley and Shipley, in Airedale, and Ilkley, in Wharfedale. While the urban areas are quite densely developed, two-thirds of the District is rural with moorland and attractive valleys surrounding and penetrating into the urban areas.
- 3.21 The City of Bradford is located on the key transport network with access to wider Leeds City Region in particular Leeds to the east. There being strong two way movement of labour between Bradford and Leeds and north Kirklees and Calderdale.
- 3.22 The Airedale corridor links a string of communities from South Craven to the north through to Leeds in the east.

Population

- 3.23 The District had a population of some 522,500 in 2011 which is estimated to increase significantly as are other adjoining Local Planning Authorities. The population growth forecast is significant, and is driven mainly by natural growth. The District's population is also expected to become more ethnically mixed with significant growth among younger age groups, BME groups and within the more deprived areas of the District. This change in population composition and shift towards groups that traditionally experience lower labour market attainment.

Deprivation

- 3.24 Bradford is ranked high in the Index of Multiple Deprivation rank Bradford. It has the biggest gap between the ranking of its most deprived and its least deprived neighbourhoods. The most deprived areas in the district are concentrated in the inner city areas such as Manningham and Bradford Moor, and in Keighley. By contrast, the more affluent suburbs such as Ilkley, Ben Rhydding and Burley-in-Wharfedale rank among the least deprived areas in the country.
- 3.25 The District priority is to tackle deprivation though supporting a suitably skilled labour force, supporting economic development and regeneration and improved access to jobs both within the District and the significant opportunities within the Leeds City Region and beyond.

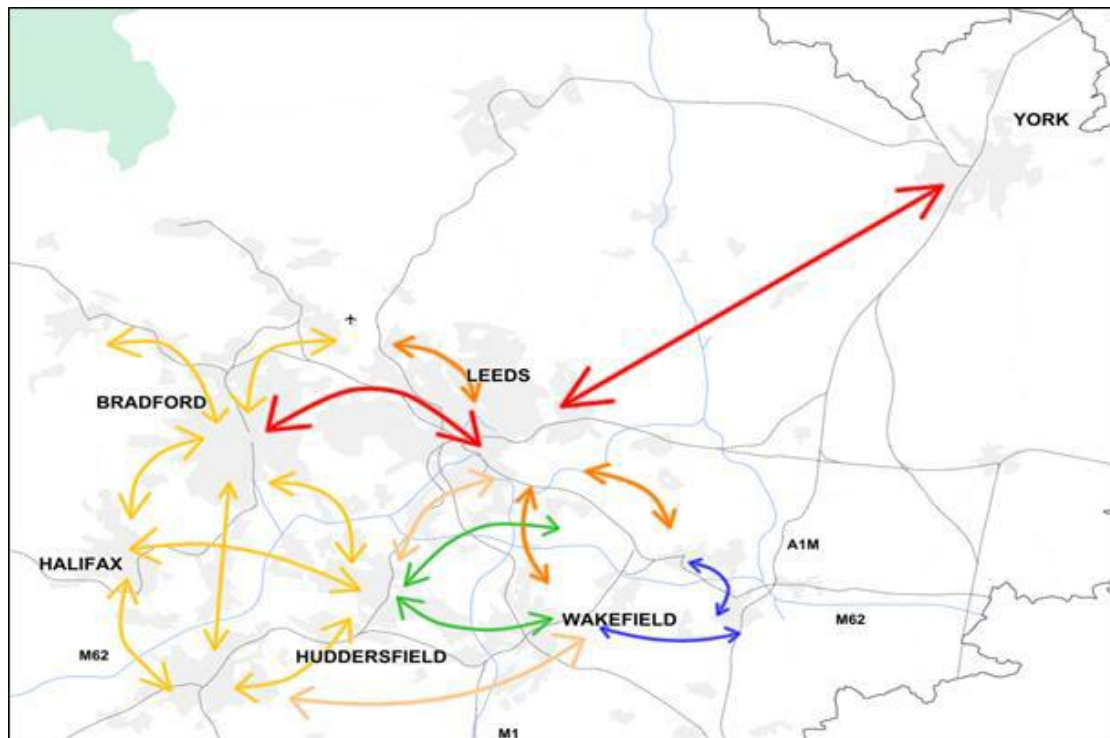
Economy

- 3.26 Bradford has the third largest economy in Yorkshire and the Humber behind Leeds and Sheffield. Bradford contributes £7.6bn to the UK economy.
- 3.27 A series of major companies have their headquarters in the District, including Morrisons, Yorkshire Building Society, Provident Financial, Hallmark Cards, Pace, Freeman Grattan Holdings and Yorkshire Water. The city centre is a key driver accounting for 17% of all employment. Canal Road, Leeds Road and the M606 corridors are other major employment locations within the City of Bradford. Airedale provides the other key location for employment and is a well served transport corridor connecting the settlements of Keighley, Bingley and Shipley and beyond into north Yorkshire.
- 3.28 Manufacturing was traditionally the most significant sector. Bradford manufacturers produce a fifth of the district's economic output. There are 7,800 employees in high and medium technology manufacturing with growing tele-health and digital sectors.
- 3.29 However it is the service sector that dominates Bradford's economy with sectors such as business and professional services seeing the fastest growth in recent decades. The District is overly reliant on public sectors employers mainly in health and education. The

majority of these jobs are located in Bradford City with Airedale and South Bradford less reliant on public sector jobs.

- 3.30 Worklessness and unemployment remain a significant issue for the District in particular young people. The highest concentrations of unemployment occur in areas close to Bradford City Centre and in outlying social housing estates such as Holme Wood, Buttershaw, Allerton, Thorpe Edge and Fagley. Unemployment is lowest in Wharfedale and the Pennine Hills. This pattern of under employment is reflected by patterns of deprivation.
- 3.31 **Bradford City Centre is the main focus for economic, educational, administrative and cultural activity within the District.** Accounting for 1 in 6 jobs in Bradford District the City Centre offers real potential as an engine for growth and regeneration. The City Centre Growth Zone will provide a focus for investment and will drive growth by providing a distinct offer to businesses wanting to locate or expand in Bradford City Centre.
- 3.32 There is a large, and increasing, student population within Bradford. The University of Bradford offers leading national research departments in management, peace studies and archaeology, and the institution has strong links with industry and the community. The development of Bradford's Learning Quarter is envisaged to help coordinate the investment activities happening around the University and College which in turn will facilitate development of high value knowledge-base businesses.
- 3.33 There is significant inter relationships with other LCR districts in terms of access to jobs with interdependencies between many adjoining areas in particular Leeds. As well as supporting economic development within the key areas within the District the Council has sought to improve accessibility to jobs both within the District as well as beyond especially within the Leeds Bradford Corridor where there are significant populations including areas of deprivation and worklessness.
- 3.34 The figure below shows the relationships within LCR in terms of travel to work.

Figure 4 Distribution of key journey to work movements across the City Region



(Source; LCR SEP 2014)

Bradford and the City Centre

- 3.35 Bradford City Centre is at the heart of a district of around 523,100 people (Source: ONS Mid Year Estimates 2011).
- 3.36 The exploitation of the abundant natural resources helped to fuel a rapid expansion of Bradford during the Industrial Revolution when it became the Wool Capital of the World.
- 3.37 During this period, thousands of people migrated into the centre, including many from around the world, to work in the numerous woollen mills. The city boomed and the population swelled from 13,000 to 280,000 during the 19th Century.
- 3.38 In order to accommodate this growth the streams were culverted and built over. A new canal link was constructed, later followed by a railway for moving goods and materials between the city centre and the wider region. The railway still remains today but the Canal, became redundant and was abandoned 1922 following the passing of the Bradford Canal (Abandonment) Act.
- 3.39 The rapid industrialisation of the city caused problems such as squalor and environmental degradation. However many of the buildings from this era reflect the prosperity and confidence in the city at the time. Much of this built heritage still remains today including City Hall, the Wool Exchange and the merchant's quarter of Little Germany.

- 3.40 By the 20th Century the woollen trade in Bradford had started to decline resulting in a long, drawn out period of decline. However people still continued to migrate here, this time from further a field, from Italy and Eastern Europe, and from Commonwealth countries in the Caribbean and Indian sub-continent.
- 3.41 Large parts of the city centre were rebuilt during 1960's, with some of the architectural heritage being demolished and replaced with buildings which have not reflected the old architecture. This, together with big new road building schemes, has created a fragmented city centre, which in parts is awkward for pedestrians to move around.
- 3.42 At the start of the 21st Century the city centre was still experiencing serious challenges in a number of areas including a failing property market, a weak commercial sector, a poor retail and leisure offer and poor image, resulting in low visitor numbers and subsequent spending leading to an underperforming economy for a city of its size. Also, as an industrial city, it has never had a strong office sector, or a tradition of people living an urban lifestyle in the city centre.

The Regeneration of Bradford City Centre

- 3.43 This section provides the regeneration context for the city centre from formation of the Bradford Centre Regeneration Company in 2002 through to the present day activities relating to Bradford City Plan.
- 3.44 In September 2002, the Government granted approval for the establishment of an Urban Regeneration Company for Bradford City Centre.
- 3.45 This company was established in February 2003 under the name Bradford Centre Regeneration (BCR Ltd). It was jointly funded by City of Bradford Metropolitan District Council, Yorkshire Forward (the Regional Development Agency) and English Partnerships (the national regeneration agency).
- 3.46 BCR Ltd was disbanded by the Council and its partners in 2010. The future regeneration delivery arrangements for the City Centre will be addressed through Bradford City Plan activities.

The City Centre Masterplan

- 3.47 In February 2003, Alsop Architects were appointed to prepare a Masterplan for the Bradford City Centre. This was published in September 2003 and set out a new vision for the future of the city centre.

- 3.48 The big idea of the Masterplan was to create a new city centre park that will change people's perceptions of Bradford and differentiate it from other cities.
- 3.49 The Masterplan identifies four separate neighbourhoods or 'fingers of intervention':
1. The Bowl – proposes a large pool of water outside City Hall at the centre of the new park. Radiating out from the Pool are, a Pier attached to the National Museum, a new Business Forest, and the other three neighbourhoods.
 2. The Channel – proposes reintroducing the Bradford Canal to the city centre alongside which is a new canal side community.
 3. The Market – proposes an alternative multi-cultural retail offer with new public spaces.
 4. The Valley – proposes bringing Bradford Beck back to the surface, with a green corridor along Thornton Road including Wetlands and an Orchard.
- 3.50 The aim of this approach is to promote a step change in the economy, inspire better quality development, and create a city centre that is used and cared for by all of the city's different cultures.
- 3.51 On 14th October 2003, City of Bradford Metropolitan District Council's Executive welcomed the Masterplan for the city centre. Subsequently at the meeting of the Executive on 9th March 2004 it was resolved that the Council would:
1. Prepare a replacement planning document for the Bradford Centre Regeneration area as a high priority.
 2. Co-operate with BCR in the commissioning of studies and project plans.
- 3.52 At the meeting of the City of Bradford Metropolitan District Council Regulatory and Appeals Committee on 8th March 2005 it was resolved that:

"The Masterplan for Bradford City Centre be treated as a material consideration in the determination of planning applications."

- 3.53 Taking forward the Masterplan, the Council and BCR in 2005 and 2006 commissioned consultants to produce the following:
1. City Centre Design Guide
 2. City Centre Streetscape Manual
 3. Neighbourhood Development Framework for each of the four neighbourhoods identified in the Masterplan.
- 3.54 The purpose of these documents is to take forward the vision of the Masterplan and demonstrate how it can be delivered.

The Neighbourhood Development Frameworks (NDFs)

- 3.55 The Masterplan identifies four separate neighbourhoods in Bradford City Centre – The Bowl, The Channel, The Market, and The Valley. In late 2004/early 2005 consultants were commissioned by City of Bradford Metropolitan District Council and BCR to produce a Neighbourhood Development Framework (NDF) for each of the four neighbourhoods.
- 3.56 The purpose of the NDFs is to build on the aims of the Masterplan and produce a deliverable strategy and a set of projects for each neighbourhood.
- 3.57 On 7th February 2007, the City of Bradford Metropolitan District Council's Regulatory & Appeals Committee resolved that:

The four Draft Neighbourhood Development Frameworks for the City Centre be treated as material considerations in the determination of planning applications pending the adoption of the Bradford City Centre Action Area Plan.

Regeneration Achievements so far...

- 3.58 Bradford city centre is identified by the Council and its partners as an area with significant regeneration and economic development potential.
- 3.59 There are now significant signs that the city is beginning to successfully address these challenges and turn around its fortunes, reflecting the growing confidence that Bradford has in itself, and which others have in the city.
- 3.60 The city centre also enjoys a substantial, high quality Victorian architectural heritage. There are over 100 Listed Building entries comprising over 300 individual addresses in the city centre. Shopping

giant **Freeman Grattan Holdings have relocated their headquarters into Priestleys Warehouse** in the Little Germany Conservation Area of the city centre which has acted as a catalyst for further investment in the area.

- 3.61 The Council has worked actively with Historic England to introduce the **UK's first Local Listed Building Consents Order for the Little Germany Conservation Area of the city centre** which alongside a Local Development Order allows conversion and change of use of listed buildings without the need for planning consent.
- 3.62 At the same time, major investment has been made in the city centre public realm over the past ten years. A programme of **Heritage Street enhancements** has been carried out which has transformed much of the city centre pedestrian area.
- 3.63 One of the most significant investments in the city centre has been the **delivery of Bradford City Park**. This multi award winning public space now hosts an annual events programme which in 2012, over the course of the year, generated an estimated £2.5 million for the local economy.
- 3.64 Another significant investment has been the **£50million Southgate development** on the corner of Thornton Road and Godwin Street which included a new headquarter building for Provident Financial and the opening of the Jurys Inn Hotel.
- 3.65 There is a **strong and vibrant presence of cultural and visitor attractions in the city centre**. In 2013 an estimated 4m people visited City Park, whilst the National Media Museum (circa 500,000 visitors), Alhambra Theatre (250,000 theatregoers), St Georges Hall and The Leisure Exchange are jointly seeing nearly 1million visitors per annum go through their doors. Bradford is also the **world's first UNESCO City of Film** and plays host to the annual Bradford International Film Festival at the National Media Museum and its associated cinemas.
- 3.66 **Bradford city centre is also home to both the University of Bradford and Bradford College**. In addition, the Council and its partners are leading the UK agenda in terms of integrated learning through our programme of Industrial Centres of Excellence bringing key educational institutions, businesses and the population together.
- 3.67 In recent years, Bradford city centre has been the focus of significant investment, reinforcing its role as a driving force of economic growth and prosperity. In recent years, the city centre has seen investments in major developments of over £370m. This includes sizeable investment in the University and College estate (over £240m) and over £130m, since 2010, in public realm, new hotels, grade A office development, and the perception-changing Bradford City Park.

- 3.68 **Bradford's 'City Centre Growth Zone'** is a £35million initiative set up to support new businesses and enable existing business growth. The City Centre Growth Zone continues to help to raise the profile of Bradford as a business location, and provides significant financial incentives and professional support to set up new businesses in the city centre.
- 3.69 The value of investment on site in 2014 was estimated at over £500 million. Following the completion of City Park in 2012 which has significantly raised the profile of the city centre, the opening of the **570,000 sq ft The Broadway Shopping Centre** by Westfield and Meyer Bergman (development value circa £265m) will elevate the city centre retail and leisure offer to new levels. There is the prospect of further potential opportunities for retail and leisure developments on Broadway, The XChange development and on the former Royal Mail Sorting office site next to Bradford Forster Square Station. The city centre is beginning to experience an increase in city centre values and footfall.
- 3.70 The Council is also **supporting the high street by introducing City Centre Local Development Order (LDO) 1** which principally applies in streets adjacent to the proposed Westfield Shopping Centre (see map below) which are suffering relatively high levels of vacancies causing a loss of footfall and the deterioration of the quality of the environment in this part of the city centre. The Order allows for the change of use of premises to any use within the A1 (Retail), A2 (Office), A3 (Restaurant) and A4 (Drinking Establishments) use classes.
- 3.71 The Council and its partners are continuing plan for further invest in major infrastructure projects in the city centre including the proposed new **City Centre Swimming Pool and Leisure Centre** scheme at the former Britannia Mill site on Portland Street. The Council is also working with its partners, West Yorkshire Combined Authority and Network Rail on ambitious station redevelopment **Masterplan proposals for The Bradford Interchange Station and the Bradford Forster Square Station.**
- 3.72 There has also been an increase in residential investments in the city centre following the successful delivery of the **Chain Street housing** scheme in the city centre. The Council has also introduced the **City Centre Local Development Order (LDO) 2** which will allow the conversion of upper floors of units within the Primary Shopping Area to be converted to 9 or fewer residential units without planning consent.

Bradford City Plan

- 3.73 On 10th February 2015 the Councils Executive Board endorsed Bradford City Plan as regeneration delivery framework for Bradford City Centre.
- 3.74 Bradford City Plan is a non statutory plan which comprises two documents – a detailed Technical Report and a Prospectus. The Technical Report sets out the detailed issues and challenges facing the city centre, and a rationale and action plan to address those challenges. The Prospectus summarises the technical report and identifies the priority actions that the Council and its partners will be focussing on delivering. It is an outward facing document with an intended audience of potential investors, developers and partners.

Bradford City Plan – Vision

The Vision for the city centre is simple yet challenging:

‘Bradford city centre will be a place that promotes pride, well-being and aspiration’

To achieve this, Bradford City Plan includes a wide range of actions that address challenges and embrace opportunities.

- 3.75 Bradford City Plan has become a delivery the regeneration framework for partnership working to achieve a decade of regeneration and economic growth in Bradford city centre. It identifies the strategy, plans, and prioritised actions to achieve economic growth and physical development of the city centre - delivering benefits to local people across the District, and the Region – for the next ten years. In particular it addresses The Producer City agenda to:
- Create the conditions for business – to make the city centre a great place to set up, grow and run a business.
 - Make innovation and skills work – in association with the university and college in particular, putting innovation, knowledge creation and higher skills at the heart of our economy
 - Trade on our culture of enterprise – building on our strengths to compete in the global economy
- 3.76 In addition Bradford City Plan addresses a social and place making agenda with proposed actions that will help make the city centre a location of choice for business and investors; the district’s diverse communities; visitors; and people looking for a place to live. It highlights the need to find new uses for vacant buildings, the

revitalisation of the high street, the construction of new homes, and the bringing back into use of older buildings. It identifies the importance of developing an inclusive, appealing and well managed leisure offer, and the need to continue to provide a vibrant, well maintained public realm.

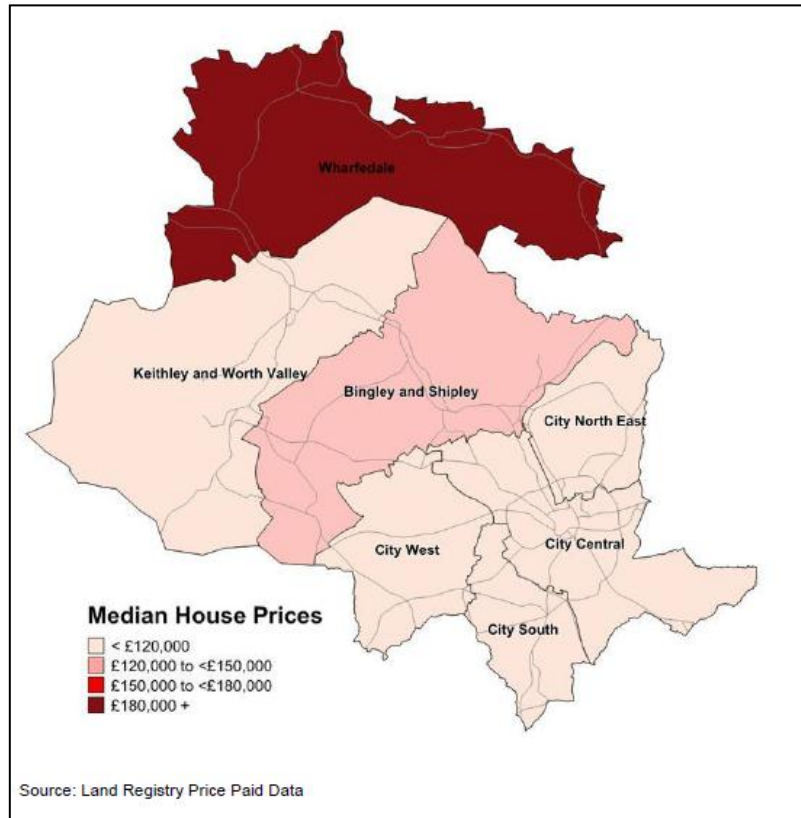
- 3.77 The priorities and proposals of Bradford City Plan are organised around five priority outcomes each with its own chapter in the Technical Report. The outcomes are as follow:
- Bradford City Centre as a Place of Dynamic Business & Entrepreneurship
 - Bradford City Centre as a Centre of Excellence for Learning
 - Bradford City Centre as an Exemplar of 21st Century Urban Living
 - Bradford City Centre as a Major Transport Hub
 - Bradford City Centre as a Destination & Experience
- 3.78 During the development of Bradford City Plan five key locations have come to the fore where themes and activities converge and where the Councils and its partners believe activity should be focussed for maximum regeneration and economic impact. These locations have been referred to as 'Pulses'. These Pulse locations can be summarised as follows:-
- Pulse 1 Top of Town
 - Pulse 2 Forster Square
 - Pulse 3 Thornton Road
 - Pulse 4 City Park Business/ Culture Cluster
 - Pulse 5 City Park Retail/ Leisure Connection
- 3.79 The Bradford City Plan has informed the Bradford City Centre Area Action Plan (as the statutory development plan) to deliver the schemes and associated infrastructure over the next 15 years.
- 3.80 On the basis of a range of evidence the SHMA concluded that Bradford District can be considered as a self contained housing market area (albeit with strong links to adjoining areas within the Leeds City Region). The SHMA identifies that there are a number of sub areas within the district which exhibit broadly similar housing market characteristics.

Figure 5 Bradford SHMA Sub Areas



- 3.81 Bradford District has approximately 210,000 dwellings (derived from Council Tax data, 2013) occupied by around 200,000 households (CLG 2011 based Interim Household Projections).
- 3.82 The housing stock is also dominated by private sector dwellings, with levels of social housing well below the regional and national average (15%, 2011 Census). The shortage of affordable housing is a major issue for both urban and rural areas. Affordability issues in Wharfedale, Airedale, the Worth Valley and some outlying suburbs of Bradford are where house prices are high. Affordability issues in the inner city are where income levels are low. House prices in the District are generally lower than Yorkshire & Humber as a whole but there are significant variations between sub areas with comparable properties being worth significantly more in Wharfedale than in the inner city.

Figure 6 Median House Prices 2012



- 3.83 The SHMA and the district’s housing strategies provide an analysis of the key housing market drivers in Bradford and identify specific groups for which need and demand must be catered for within the Local Plan. Specific groups identified as having particular housing requirements in the district include families, older people and Black and Minority Ethnic (BME) households. The key housing market drivers in the district are demographic, economic and dwelling stock drivers.
- 3.84 Demographic change will be a key driver of the district’s housing market, both in terms of overall population and household growth and increase in the older aged population. A major strategic challenge will be to ensure a range of appropriate housing provision for Bradford’s older population. There is considerable ethnic diversity within the district and an important underlying driver is the growth of the BME population. **The proportion of BME households is highest in the City Central sub area, an area which also suffers from among the highest levels of overcrowding and poor quality stock in the district.** Overcrowding is a major issue in City Central and is linked to the size of BME households and reflects the need for larger properties.
- 3.85 Families account for nearly half of the households across the district and given the likely level of population and household growth driven by natural change the current demand for core family housing products, such as houses with 2 to 4 bedrooms, will increase if there

is not a strong focus on the supply on family housing. The district is expected to see significant growth in jobs over the plan period. The provision of an appropriate range of housing will play an important role in supporting the economy. A strategic priority is to ensure the District attracts and retains economically active households; delivering a range of good quality housing types will help to achieve this.

Transport and Connectivity

- 3.86 Bradford is in a key strategic location within the Leeds City Region with two rail routes (Calder Valley Line and Airedale Line) providing public transport connectivity across the District and beyond, access to Leeds Bradford International Airport (LBIA) which lies within the Leeds City Council curtilage, and connections to the strategic highway network via the M606 and M62.
- 3.87 Although Bradford has a relatively competitive position in terms of its connectivity to wider destinations, the District internally faces the challenge of planning for infrastructure delivery to match intensive growth. There are also some key services, employment and housing areas in Bradford that are poorly served by public transport, cycling and walking routes.
- 3.88 The road network within the Bradford City urban area is characterised by a radial pattern of routes leading to the City Centre, though there are also outer and inner ring roads. There is also a relatively high level of bus use throughout the urban area which is encouraged by a generally good quality and high frequency network. Bus use into the City Centre has markedly increased between 2013 and 2014.
- 3.89 As noted elsewhere, there are significant variations in the level of wealth across the District, which also reflect patterns of commuting with a significant number of Bradford's higher earners, for example, commuting from Airedale, Wharfedale and Ilkley to jobs outside the District, mainly in Leeds.
- 3.90 Bradford has a fairly high level of congestion compared to the national average. However, congestion in Bradford is not a District wide problem but concentrated at local hot spots, especially at peak times along the major radial routes to and from the central part of the District. Some of the District's towns, notably Keighley and Shipley also suffer from congestion at peak periods.
- 3.91 Rail patronage in the District has increased significantly over the years and is expected to continue to be the dominant public transport mode in those corridors where it exists, notably in Airedale, where the rail network is at capacity (to and from Leeds) in peak times.

3.92 Air travel to and from Bradford is set to increase as the City is now connected to more frequent and wider national and international destinations through the Leeds-Bradford Airport and Manchester Airport. LBA is expected to play a much more important regional role in the future and thereby increase its contribution to the economy of the region.

3.93 In the long term good connections between all transport modes will be increasingly important for Bradford. The District is unlikely to create enough jobs on its own to meet the demands of a growing workforce, and therefore links with neighbouring Districts will be important to connect people with employment and housing.

Environment

3.94 One of the most striking features of the District is the quality of its landscape and in particular the proximity of the main urban areas to areas of high landscape value. The character of the District's landscape is very varied, ranging from the rugged open moorland of the South Pennine uplands to rolling farmland, and open river valleys to wooded hillsides. The habitats in the Bradford District are largely influenced by their underlying geology. The Millstone Grits of the Southern Pennines to the west of the District give rise to substantial areas of upland heathland and blanket bog, whilst the softer shales of the Coal Measures have produced more woodlands, valley wetlands and unimproved grasslands. The uplands support a wide range of bird species. The demand for development on the lower-lying Coal Measures has fragmented these habitats, although unique habitats have also been created throughout the District as by-products of industrialisation, such as reservoirs, canals and quarries.

3.95 The Two main Rivers of Wharfe and Aire pass through the District and from part of wider **river catchments which need careful management in order to ensure address the potential risks from flooding locally and also downstream.**

Built Heritage

3.96 Bradford District contains a rich and diverse built heritage which consists of the third highest number of designated assets in the Region and one of only two World Heritage Sites in Yorkshire. The architectural and historic wealth of protected buildings and 59 designated conservation areas are highly valued for the essential contribution they make to local distinctiveness and environmental identity. The built heritage is of benefit to the economy and tourism.

3.97 The outstanding value and universal interest of the World Heritage Site at Saltaire site is not only a unique asset to the District, but also invaluable in showcasing the rich heritage of the District to a wider audience.

Cultural Attraction and Tourism

- 3.98 The **provision of cultural amenities is good in Bradford and in particular Bradford city centre which includes The Alhambra theatre, St Georges Concert Hall and Bradford City Park.** Key cultural attractions include The National Media Museum, Haworth and Keighley and Worth Valley Railway, and Saltaire. Visitors are also attracted by the built heritage of the District.
- 3.99 Although the District has the advantage of a range and depth of major tourist attractions in Yorkshire, tourism industry is underachieving in terms of volume and value of both day and staying visitors. The key challenge is to lift the appeal and quality of some attractions and encourage people to make more visits. This also requires improvements to essential infrastructure including transport connectivity within the District and beyond.

Strategic Planning in Leeds City Region (LCR)

- 3.100 There has been a long legacy of strategic cooperation and joint work within the region. The Regional Assembly working collaboratively with the Local Planning Authorities and other key bodies led in the preparation of the Regional Spatial Strategy (RSS) for Yorkshire and the Humber (adopted May 2008) which provides the strategic context for the preparation of Local Plans in the Region. The Regional Assembly provided a strong forum for coordination and alignment on strategic planning issues backed up with strategic evidence and intelligence as well as regular monitoring.
- 3.101 In addition joint working (both officer and members), has also historically taken place at the sub regional level across West Yorkshire as well as the wider Leeds City Region arrangements prior to the formal establishment of the LEP. Other formal working arrangements are also in place, which relate to specific strategic issues e.g. Pennine prospects.
- 3.102 Following the Localism Act coming into force the Secretary of State revoked the Yorkshire and Humber RSS on 6 July 2010. This revocation was subsequently quashed by High Court ruling published 10th November 2010 and subject to the then emerging Localism Bill passing into law and further work on the Strategic Environmental Assessment which itself was the subject of consultation.
- 3.103 The Government published the updated SEA of the proposed revocation of the Yorkshire and Humber Plan in September 2012.
- 3.104 An order was laid before Parliament on 29 January 2013 to formally abolish the Yorkshire and Humber Plan from 22 February 2013, with the exception of the regional strategy's green belt policies for York

which will be retained until York City Council adopts a local plan defining green belt boundaries.

- 3.105 The Leeds City Region Leaders Board approved an Interim statement on 21st April 2011 which agreed to continue to follow key elements of the RSS in their ongoing developments plans.
- 3.106 With the revocation of RSS, under the Localism Act local planning authorities as well as other prescribed bodies have a new 'Duty to Cooperate' on strategic matters which affect more than one local authority. Leeds City Region Leaders agreed the broad approach to be adopted to facilitate this at their meeting on 6 December 2012 in light of the requirements of the Act and guidance provided in NPPF.
- 3.107 The Leaders Board agreed a common methodology to capture the 'beyond the plan area', implications for the strategic priorities set out in paragraph 156 of the NPPF and any additional matters that are identified and shown to have such implications. This approach enables the *common tracking* of the development of understanding of the 'beyond the plan area' implications of the relevant plan and the evolving response to addressing these matters as the plan passes through each stage of preparation.
- 3.108 In addition, it committed to the pursuit of joint approaches to technical work whenever this is practical and will seek to ensure alignment of approaches and methodologies where joint working was not possible or appropriate.
- 3.109 In support of the LCR approach Local Plan lead officers meet bi monthly on Duty to Cooperate matters together with other key bodies including Environment Agency, and the Highways Agency. This informs operational alignment and coordination of strategic matters across the LCR Local plans. It reports where required to LCR Heads of Planning who in turn report to Directors of Development. Updates are reported to the LCR Leaders Board on Duty to cooperate matters when required.
- 3.110 The LCR Planning Portfolio Board has been established which provides a member arena for considering strategic planning issues and looks to support Local Planning authorities to discharge their 'duty to cooperate'.
- 3.111 The approach which has developed to date and process for going forward has been formally approved in the form of a formal statement of cooperation. The 'Leeds City Region Statement of Cooperation' was approved at the Leaders Board at its meeting on 1 July 2014 and subsequently reported for information to the West Yorkshire Combined Authority on 18 September 2014.

- 3.112 The LCR Planning Portfolios Board intends to monitor progress with regard to implementing the commitments in the LCR Statement of Cooperation and will develop these processes, as required. To this end, the document has been recently updated as part of a wider review of strategic planning and in light of emerging good practice. The latest version of the full document is reproduced in Appendix 1.
- 3.113 The Statement identifies how authorities within the Leeds City Region Partnership will work collectively going forward, but it also sets out existing good practice being applied by city region Planning Authorities, as well as setting out the actions to be taken and tools to be used in identifying and addressing cross-boundary issues.
- 3.114 Four high level principles that will influence a joint approach to meeting the Duty to Cooperate have been identified and included in the Statement. These are:
- **Cooperation throughout the development plan process:** the Duty to Cooperate is a statutory requirement for Local Plan preparation, implementation, ongoing monitoring and review; the Duty to Cooperate therefore applies throughout the development planning process.
 - **Going beyond consultation:** effective cooperation requires sustained joint working, identifying actions and achieving outcomes.
 - **Taking a pragmatic approach:** not all issues will require cross-boundary cooperation and the scale at which cooperation needs to take place to achieve the most effective outcomes will be dependent on the nature of the strategic matter.
 - **Responding to all requests to engage:** at a local level where planning authorities within the Leeds City Region partnership request input into their development plan process a response will be provided from other authorities in the partnership.
- 3.115 The statement sets out the agreed LCR duty to cooperate process (Section 3) as well as the approach to strategic cooperation (Section 4). The statement identifies several key thematic strategic issues and work streams which are taking place at the LCR to cooperatively understand and plan for these issues. The details of how Bradford has used the process and arrangements in place is set out below in Section 4.
- 3.116 Outside the LCR arrangements the Local Planning Authority has worked directly with neighbouring LPAs and other bodies where relevant and appropriate on strategic planning matters on an ongoing basis. This has included sharing of data and information as well as

discussions on strategy and policy content. These approaches and outcomes are set out below in summary.

Position of Adjoining Local Plans

3.117 The following sets out the position of adjoining Local Planning Authorities in terms of Local Plan preparation and strategic issues relevant to their area. Appendix 3 sets out the position of the Local Plans within the Leeds City Region.

Leeds

3.118 Leeds Site Allocations DPD Publication Draft has been out for public consultation from 22 September 2015 to 16 November 2015.

Kirklees

3.119 Kirklees Draft Local Plan consultation ends on 21 December 2015.

Calderdale

3.120 Currently at an early stage of producing a single local plan, consultation on Site Assessment Methodology taken place in April 2015, and Call for Sites currently taking place.

Craven

3.121 Craven Local Plan first informal stage consultation 4th November 2014, with further informal consultation in September 2015.

Harrogate

3.122 Currently preparing a single local plan which updates strategic policies including housing need following withdrawal of sites DPD. Local Plan Issues and Options consultation undertaken in July 2015.

Pendle

3.123 Submitted Core Strategy in December 2014, with examination hearings concluding in April 2015. Consultation on main modifications August – September 2015.

4.0 Strategic Issues

4.1 In line with the LCR agreed approach a draft table which documents the key strategic issues for the Bradford City Centre AAP DPD has been prepared and developed in consultation with relevant bodies and Local Authorities. The draft was developed through the LCR officer group arrangements. This has been updated to reflect the further work and discussions following publication up to submission. The Draft version is found in Appendix 2. This version was considered by the Planning Portfolio Holders held on 18 September 2015.

4.94 The key strategic issues are outlined in detail below with reference to how they have been developed including the evidence base, policy direction and the nature of any cooperation under the duty and the resulting influence on the plan.

Core Strategy

4.95 Core Strategy Spatial Objective 7 *To promote, manage and develop the image and the role of Bradford City Centre as a regionally significant business, commercial, shopping, civic and cultural area* provides the context for delivering the Bradford City Centre AAP.

4.96 Strategic Policy SC4 and sub area policies BD1 and BD2 establish the strategic planning framework for the Bradford City Centre AAP. As part of work on the Core Strategy, extensive work has been undertaken on discharging the Duty to Cooperate in relation to strategic issues, details of which can be found in the supporting Duty to Cooperate Statement to the Local Plan Core Strategy (December 2014).

Strategic Issues

Trade draw and impact on vitality and viability of neighbouring area town centres

4.97 Bradford City Centre has undergone significant regeneration with the completion of Bradford City Park, Heritage Street Public Realm Improvement Programme and the opening of The Broadway Shopping Centre. The regeneration and development of Bradford City Centre is in line with the Leeds City Region LEP Strategic Economic Plan which has designated Bradford city centre as a growth centre. Bradford city centre has been underserved with regard to retail and leisure and the current developments completed and in the pipeline will ensure that Bradford city centre compliments the city and town centres in the region.

Significant increase in residential offer in Bradford, as a focus for strategic regeneration and supporting infrastructure.

- 4.98 Proposals for at least 3,500 new homes in the Bradford City Centre AAP will potentially increase the demand on the road and rail network. The Council has commissioned Steer Davis Gleave who has produced an AAP Transport Study which has made a number of recommendations relating to highway and cycling infrastructure which have been taken forward through the AAP.
- 4.99 The council is working with the West Yorkshire Combined Authority and its partners on transport schemes to support the housing and economic growth envisaged over the next ten years as part of the £1.6bn West Yorkshire Plus Transport Fund programme.
- 4.100 The above commentary demonstrates the mature working relationships that the various partners involved in strategic and local transport development in West Yorkshire have developed over many years. There is no reason to believe that these relationships will not continue into the future and enable the transport implications of the Local Plan to be addressed through partnership working both within the local plan and outside.
- 4.101 One of the core planning principles of the NPPF is that planning should *‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.....’* (Paragraph 17). The NPPF further states that in drawing Local Plan the LPA should *‘identify priority areas for economic regeneration, infrastructure provision and environmental enhancement’* (Paragraph 21).
- 4.102 The NPPF also requires local planning authorities to set out the strategic priorities for the area in the Local Plan which should include strategic policies to deliver *‘the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk the provision of health, security, community and cultural infrastructure and other local facilities.’* (Paragraph 156). Crucially, Local Plans *‘should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework’*. (Paragraph 157).
- 4.103 The Council has been proactive in infrastructure assessment and frontloaded this into its local plan AAP preparation at the earliest opportunity. A draft AAP Local Infrastructure Plan (LIP) has been produced following consultation with infrastructure providers.
- 4.104 The LIP methodology has been informed by guidance in the Planning Advisory Service (PAS) Infrastructure Planning & Delivery Resource book. The methodology has also been influenced by the approach adopted for the Regional Integrated Infrastructure Scoping Study for the Yorkshire and Humber and similar studies from across the country.

Previous studies, including ‘Shaping Neighbourhoods’ (Barton H. et al., 2003) have been useful in establishing methods and any standards.

- 4.105 A West Yorkshire Officers’ Group (now known as the Leeds City Region CIL and Infrastructure Officers Group) was set up to share good practice and experience of preparing and updating Infrastructure Plan. Officers from Bradford attended the meetings which were held on quarterly basis. The group functioned as a technical, non-decision making team primarily to share practice on governance arrangements and establish a common methodology which can be used to prepare Infrastructure Plan within each individual authority.
- 4.106 The purpose of the Draft AAP LIP was to provide an infrastructure capacity assessment for the District which included consulting with physical, social and green infrastructure providers to establish what infrastructure provision there is in the district, and identifying any gaps or capacity issues within the existing provision. The draft AAP LIP also provided an initial assessment of what infrastructure will be required to support development within the city centre regeneration area over the plan period and how it could be implemented. This process mainly involved desk based analysis, liaising with critical infrastructure providers (Highways Agency, Environment Agency, Education, NHS), and discussions with those responsible for infrastructure delivery within the Council.
- 4.107 The Council has appointed consultant Arup to provide support on infrastructure planning and provide accurate information across all infrastructure types.
- 4.108 Technical assessments has been carried out on each of following infrastructure types: Transport; Utilities; Telecommunications; Flood Risk and Drainage; Waste and Recycling; Green Infrastructure, Open Space and Public Space; Sport, Leisure and Recreation; Education; Community and Cultural; Health; and Emergency Services.
- 4.109 Meetings were held with a wide range of organisations and Council departments and services including:
- Council Departments, Services and Teams: Development Plans; Major Development Team; Asset Management; Housing; Transportation and Highways; Economic Development Services; Minerals and Waste; Environment and Neighbourhood; Design and Conservation; Libraries, Museums and Galleries.
 - External Infrastructure Providers such as Bradford and Airedale NHS; West Yorkshire Police; West Yorkshire Fire & Rescue; Yorkshire Ambulance Service; Environment Agency; Highways Agency; Yorkshire Water; National Grid.

- 4.110 A full list of internal contacts within the Council and external organisations consulted is included in Appendix C of the LIP. The majority of these meetings were attended by an Arup and a Council Planning Policy Officer.
- 4.111 The Draft AAP LIP thus provides a framework for coordinating and focusing investment and action across different departments within, and different stakeholders with responsibilities and interests in infrastructure. Work is ongoing in partnership infrastructure service providers to set priorities and explore options for funding.
- 4.112 The Local Infrastructure Plan is based on information currently available and should be able to respond to changing needs and circumstances over the plan period. Consequently it is intended to be remain as a 'live draft' and will be reviewed and updated regularly taking account of all the changes as they come forward.

Green / Blue Infrastructure proposals which may have a strategic or cross boundary impact on public health

- 4.113 Proposals for enhanced green and blue infrastructure as envisaged in the AAP has the potential to improve public health and tackle environmental protection issues such as air quality and flood risk.

Habitat Regulations Assessment

- 4.114 The Council has worked with Natural England and other partners by producing a Habitats Regulations Assessment screening report and has concluded that the proposals in the AAP have no significant impact on the Special Protection Area. There is potential for improvement to public health through delivery of green / blue infrastructure facilities during the AAP plan period.

Potential impact upon flood risk

Flood Risk

- 4.115 The Council has worked with the Environment Agency to produce the Level 1 and Level 2 Strategic Flood Risk Assessment, to set out information relating to strategic level testing and key issues in relation to flood risk testing linked to individual sites. A sequential test and exceptions paper has been produced.

Potential impact upon heritage

- 4.116 There is potential impact on the built and natural heritage of Bradford city centre and the wider Bradford District from tall buildings which may be proposed. The Council would assess such proposals against the relevant policies in the Bradford City Centre AAP and the Design Guide SPD, Neighbouring authorities and Historic England and other key

stakeholders will be consulted as part of the application for any tall buildings in the city centre.

5.0 Conclusion

- 5.1 The Statement sets out the approach to discharging the 'Duty To Cooperate'. It demonstrates that the Council has met the legal requirements for ongoing constructive and positive engagement as part of the development of the Bradford City Centre AAP DPD. The early stages have been underpinned by the RSS and subsequently the Leeds City Region arrangements which have provided a formal framework for dealing with duty to cooperate issues. The LCR arrangements have been supplemented by more detailed work with individual authorities and bodies as appropriate to the strategic issues.
- 5.2 It should be noted that this statement sets out a duty to cooperate activity on key issues to demonstrate legal compliance.