

# CONSULTATION DRAFT

## City of Bradford Metropolitan District Council

### Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019 Plan Review

\* Those policies with a Direct impact on viability include policies such as affordable housing, minimum housing standards etc. that have a measurable impact on viability. These have been explicitly factored into our economic viability appraisals.

Those policies with an Indirect impact have been incorporated into the viability study indirectly through the property market cost and value assumptions adopted e.g. market values, benchmark land value and BICS costs etc.

It is important to note that all the policies have an indirect impact on viability. The Council's Local Plan sets the 'framework' for the property market to operate within. All the policies have an indirect impact on viability through the operation of the property market (price mechanism).

This policy review should be read in conjunction with the following documents:

Policies Reviewed
1. Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019
2. Local Plan for the Bradford District, Core Strategy (Adopted July 2017) – where not superseded by 1.

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
<b>Strategic Core Policy SC1: Overall Approach and Key Spatial Priorities</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy sets the over approach for the management of development and planning decisions in order to deliver the Spatial Vision. It does not contain any specific policy targets/standards.</p> <p>The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>
<b>Strategic Core Policy SC2: Climate Change, Environmental Sustainability and Resource Use</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy requires that planning decisions <i>should</i>:</p> <ul style="list-style-type: none"> <li>A. Plan for a low-carbon future through innovation, adaptation and building long-term resilience</li> <li>B. seek to mitigate against the impact of climate change and support meeting the Council's carbon reduction targets</li> <li>C. Seek to assess and manage the impact of future decisions on the District's natural resources.</li> <li>D. Require new development to use resources sustainably and reduce their environmental impact.</li> <li>E. Supporting the roll out of appropriate electric vehicle charging points across the District to promote the uptake of electric vehicle use.</li> </ul> <p>This policy states that development should <i>seek</i> to achieve these outcomes, but it is not a requirement and therefore we consider there is direct impact on our viability assessment. Schemes with good environmental credentials will impact real estate values (and costs) over time through the price mechanism.</p>
<b>Strategic Core Policy 3 (SC3): Working Together</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)	Indirect	<p>This policy is about effective collaboration between the Council, adjoining local planning authorities, the District's Town and Parish Councils, partners, stakeholders and communities etc. in respect of the duty to cooperate.</p>

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	Has not been reviewed as part of the CSPR		The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.
<b>Strategic Core Policy 4 (SC4): Hierarchy of Settlements</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	<p>This sets the hierarchy of settlements across the District and the policies to support their respective roles including:</p> <ul style="list-style-type: none"> <li>• Bradford (with Shipley and Lower Baildon) as the Regional City</li> <li>• Principal Towns of Ilkley, Keighley and Bingley</li> <li>• Local Growth Centres comprising: Burley in Wharfedale, Menston, Queensbury, Thornton, Steeton with Eastburn and Silsden</li> <li>• Local Service Centres and Rural Areas: of Addingham, Baildon, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Oakworth, Oxenhope, Wilsden</li> </ul> <p>This has a spatial impact on the pattern of development throughout the District. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>
<b>Strategic Core Policy SC5: Location of Development</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy describes how the Council will allocate sites based on the following priorities:</p> <ol style="list-style-type: none"> <li>1. First priority to the efficient and effective re-use of deliverable and developable previously developed land and buildings.</li> <li>2. Second priority to sustainable Greenfield opportunities within the settlements.</li> <li>3. Third priority to the limited release of Green Belt land.</li> </ol> <p>This has a spatial impact on the pattern of development throughout the District. The implementation of this policy will impact the real estate market through the quality of the</p>

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			<p>environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>Note that we have appraised both greenfield and brownfield site typologies and are range of scheme typologies across the District (in the various housing market areas).</p>
<b>Strategic Core Policy SC6: Green Infrastructure</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Direct	<p>This policy sets out the Councils strategic requirements for Green Infrastructure (GI) e.g. of networks of multi-functional spaces; River Corridors of the Aire and Wharfe, and the South Pennine Moors etc.</p> <p>Green Infrastructure is factored into our viability assessment in a number of ways through:</p> <ul style="list-style-type: none"> <li>• the net-to-gross developable area assumptions as part of the BLV calculations;</li> <li>• the density assumption (dph) which is to allow for the relevant GI;</li> <li>• External works costs which allow for relevant GI costs.</li> </ul>
<b>Strategic Core Policy SC7: Green Belt and Safeguarded Land</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy set out:</p> <p>A. The role of the Green Belt</p> <p>B. that exceptional circumstances require Green Belt releases in order to deliver, in full, the housing growth in the District as set out in Policy HO3.</p> <p>C. Policy HO3 and the Sub Area Policies provide the strategic policy direction on key changes to the Green Belt that are necessary to accommodate housing growth. And,</p> <p>D. The Allocations DPD will set out detailed changes to the Green Belt boundary to accommodate housing growth. Furthermore,</p> <p>E. The allocations DPD will identify areas of safeguarded land on the Policies Map to meet longer term development needs for housing.</p>

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			<p>The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>Note that where green belt is released for development, the EUV of the land is low and the uplift in value is created by the change of public policy. We have appraised the strategic sites separately (see separate report).</p>
<b>Strategic Core Policy SC8: Protecting the South Pennine Moors and their Zone of influence</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy is to protect the South Pennine Moors Special Protection Area (“SPA”) and South Pennine Moors Special Area of Conservation (“SAC”) boundary under the tests of Article 6(4) of the Habitats Directive.</p> <p>The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>
<b>Strategic Core Policy SC9: Making Great Places</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	<p>This policy is about planning decisions contributing to creating high quality places, and attractive, cohesive, sustainable settlements.</p> <p>There are not specific targets or specification of development under this policy.</p> <p>The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time (price mechanism).</p>
<b>Strategic Core Policy SC10: Creating Healthy Places</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Direct	<p>This policy states that the Council will seek to create healthy places by maximising health and wellbeing gains from development proposals and ensuring that negative impacts are designed out or mitigated. This includes a range of mechanisms and cross-reference to other policies herein.</p> <p>This policy does include some direct costs to the developer, for example:</p> <ul style="list-style-type: none"> <li>• Developer contributions towards new or enhanced health care infrastructure/facilities will be sought.</li> </ul>

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			<p>In the majority of cases, however, there are no specific costs which are not included within the normal costs of development herein. We have incorporated the relevant S106 developer contributions (see Typologies Matrix).</p>
<p><b>Sub Area Policy BD1: The Regional City of Bradford including Shipley and Lower Baildon</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This policy sets the strategic pattern of development for the Regional City of Bradford (including Shipley and Lower Baildon) to accommodate 18,400 dwellings and at least 40 Ha of new employment land in the period up to 2037.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Various Urban Regeneration priorities</li> <li>• Growth areas around Bradford</li> <li>• Economic development policies</li> <li>• Environmental policies, and</li> <li>• Transport policies.</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>This policy includes some direct costs to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p> <p>Note that strategic development areas have been appraised separately (see separate report).</p>
<p><b>Sub Area Policy BD2: Investment Priorities for the Regional City of Bradford</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This policy sets the investment priorities for the Regional City of Bradford (including Shipley and Lower Baildon).</p> <p>This is to target:</p>

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<p><b>including Shipley and Lower Baildon</b></p>			<ul style="list-style-type: none"> <li>A. To improve walking, cycling and public transport infrastructure ...</li> <li>B. To support the regeneration of Bradford City Centre...</li> <li>C. To provide infrastructure to support site assembly, manage flood risk, and improve access to Bradford City Centre, Shipley town centre as part of regeneration initiatives on the Shipley and Canal Road Corridor including development of a Shipley Eastern Relief Road.</li> <li>D. To support the economic, environmental, physical and social transformation of key regeneration areas....</li> <li>E. To support a high quality sustainable urban extension in SE Bradford at Holme Wood ....</li> <li>F. Towards additional strategic highway and rail improvements.....</li> <li>G. To support the development and extension of high speed broadband</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>This policy includes some direct costs (private investment) to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p> <p>Note that strategic development areas have been appraised separately (see separate report).</p>
<p><b>Sub Area Policy AD1: Airedale</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This policy sets the strategic pattern of development for Airedale to accommodate 4,800 dwellings in the period up to 2037 and the allocation of employment land of at least 15 Ha.</p> <p>This includes:</p>

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			<ul style="list-style-type: none"> <li>• Urban Regeneration and Renewal and new housing provision in Keighley</li> <li>• Economic development polices</li> <li>• Environmental policies, and</li> <li>• Transport policies.</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>This policy includes some direct costs to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p> <p>Note that strategic development areas have been appraised separately (see separate report).</p>
<b>Sub Area Policy AD2: Investment Priorities for Airedale</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy sets the investment priorities for Airedale.</p> <p>This is to target:</p> <ul style="list-style-type: none"> <li>A. To improve public transport....</li> <li>B. To support the regeneration of Keighley and Bingley...</li> <li>C. To provide infrastructure to support site assembly, manage flood risk, and improve access between Airedale to Bradford City Centre, Shipley Town Centre as part of regeneration initiatives on the Shipley and Canal Road Corridor and the Connecting Airedale initiative (including Hard Ings Road Improvements).</li> <li>D. To take advantage of the close proximity of the City Centres of Bradford and Leeds and deliver the renewal of existing urban sites ....</li> <li>E. Support a number of Green Belt releases in sustainable locations that meet accessibility standards to Keighley, Bingley, Silsden and Steeton with Eastburn ....</li> </ul>



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			<p>F. To support the development and extension of high speed broadband...</p> <p>G. To work with Yorkshire Water and the Environment Agency to understand fully the water and waste water infrastructure requirements...</p> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>This policy includes some direct costs (private investment) to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p> <p>Note that strategic development areas have been appraised separately (see separate report).</p>
<p><b>Sub Area Policy                      WD1: Wharfedale</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This policy sets the strategic pattern of development for Wharfedale will accommodate 1,425 dwellings and at least 5 Ha of new employment land in the period up to 2037.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• new housing provision will be focused as follows: Ilkley will see the creation of 500 new homes focused on urban redevelopment opportunities together with some Green Belt changes</li> <li>• Economic development polices</li> <li>• Environmental policies, and</li> <li>• Transport policies.</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>

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			<p>This policy includes some direct costs to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p> <p>Note that strategic development areas have been appraised separately (see separate report).</p>
<p><b>Sub Area Policy WD2: Investment Priorities for Wharfedale</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This policy sets the investment priorities for Wharfedale.</p> <p>This is to target:</p> <ul style="list-style-type: none"> <li>A. To improve public transport....</li> <li>B. To invest in Ilkley town centre ...</li> <li>C. To provide infrastructure to support site assembly, manage flood risk, and improve access between Wharfedale to the Regional City of Bradford and Airedale.</li> <li>D. To support improvements to the quality and capacity of public transport along Wharfedale to Craven, the Regional Cities of Bradford and Leeds.</li> <li>E. Support a limited number of local Green Belt releases in sustainable locations to Ilkley, and Burley</li> <li>F. To support the development and extension of high speed broadband...</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>This policy includes some direct costs (private investment) to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p> <p>Note that strategic development areas have been appraised separately (see separate report).</p>

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<b>Sub Area Policy PN1: South Pennine Towns and Villages</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy sets the strategic pattern of development for the South Pennine Towns and Villages area to accommodate 1,525 dwellings in the period up to 2037.</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Focusing development on: the Local Growth Centre of Queensbury will see the provision of 300 new homes from a mix of sites including some local Green Belt changes; and Local Service Centres of Cullingworth, Denholme, Haworth, Harden, and Oxenhope for the creation of 675 new homes from sites within the existing settlement boundaries</li> <li>• Economic development polices</li> <li>• Environmental policies, and</li> <li>• Transport policies.</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>This policy includes some direct costs to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p>
<b>Sub Area Policy PN2: Investment Priorities for the Pennine Towns and Villages</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy sets the investment priorities for the Pennine Towns and Villages</p> <p>This is to target:</p> <ol style="list-style-type: none"> <li>A. To improve public transport, particularly to Queensbury, Thornton and Haworth .....</li> <li>B. Supporting sustainable economic, retail and leisure development ...</li> </ol>

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			<p>C. Managing flood risk, and improve access between Pennine Towns and Villages to Bradford City Centre, Keighley Town Centre and Halifax Town Centre as part of district wide regeneration initiatives.</p> <p>D. Encouraging locally based enterprises, initiatives that develop community resilience and sustainable regeneration and tourism that respect the character of the South Pennines....</p> <p>E. Showing respect for and enhancing the moorland setting, ...</p> <p>F. To support the development and extension of high speed broadband...</p> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>This policy includes some direct costs (private investment) to the developer. However, there are no specific costs which are not included within the normal costs of development herein, and the S106 developer contributions (see Typologies Matrix).</p>
<p><b>Policy EC1:                  Creating a Successful and Competitive Bradford District economy within the Leeds City Region</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This policy is to create a more successful and competitive District based upon the following key opportunities:</p> <ul style="list-style-type: none"> <li>A. the Young and Enterprising Population</li> <li>B. the Distinctive Offer</li> <li>C. the Growth Potential</li> <li>D. Global Connections.</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>

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<b>Policy EC2:                      Employment Land, Jobs and Skills Requirements</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy is to support the delivery of at least 1,600 jobs per annum to 2037 within the District and a minimum of 60ha of allocated employment land through the Allocations DPD. This includes:</p> <ul style="list-style-type: none"> <li>• future strategic locations and employment distributions / priorities,</li> <li>• partnership working to accelerate economic growth through implementing major regeneration initiatives and proposals across the District, ....</li> <li>• <i>seek</i> to support employment, skills development, apprenticeships and other training and education opportunities, in both the construction and end-use phases, including through Section 106 obligations where appropriate.</li> <li>• support development which relates to the District’s higher, further and specialist education establishments</li> </ul> <p>These are strategic level policies. The implementation of this policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>We note that there is potential for the Council to request S106 for employment, skills development, apprenticeships etc, however this is to <i>seek</i> and not a specific requirement or cost. In any event, developers and contractors will benefit in the long-term from the new skills. However, see our comments below for EC3.</p>
<b>Policy EC3:                      Employment Land and Skills Requirement</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This sets out how the strategic economic growth priorities set out within Policy EC2 will be delivered by:</p> <ol style="list-style-type: none"> <li>A. Bradford City Centre as the primary focus for the development of new office B1(a) floorspace within the District. ...</li> <li>B. The Regional City of Bradford and Airedale shall be the primary focus for the development of new B2 (General Industrial) and B8 (Storage or Distribution) floorspace within the District.</li> </ol>

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			<p>C. B1b uses will be encouraged within the City Centre, Education Campuses, Business Development Zones, Enterprise Zones and Strategic Economic Sites.</p> <p>D. Sources of employment land to be identified in the Allocations DPD...</p> <p>E. The Allocations DPD will examine the need for Green Belt deletions in areas of search...</p> <p>F. The Council will seek to secure an agreed training, skills development, education, apprenticeship or related programme through a s.106 agreement with applicants where the proposed development meets the following thresholds: (1) 3,500 sqm. or more of business or industrial floorspace; or (2) housing developments which would deliver 60 dwellings or more. Also, in instances where the development does not trigger one of the above thresholds then wherever feasible the Council will seek to secure alternative education or training programmes with the applicant to contribute to skills development.</p> <p>These are strategic level implementation policies. The policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>We note that the Council is to request S106 for employment, skills development, apprenticeships etc, on sites over a specific size threshold. In this respect the cost would be marginal and therefore we have assumed will be absorbed by overhead and profit/contingency so would not directly impact viability.</p>
<p><b>Policy EC4: Sustainable Economic Growth</b></p>	<p>Local Plan for the Bradford District, Core Strategy (Adopted July 2017)</p> <p>Has not been reviewed as part of the CSPR</p>	<p>Indirect</p>	<p>This policy sets out how the Council will seek to manage economic and employment growth in a sustainable manner. This is through:</p> <p>A. Assessing all site proposals submitted as potential site allocations against their deliverability and their sustainability.</p> <p>B. Monitoring the availability and suitability of employment sites on a 3 year rolling basis ....</p>

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			<p>C. Refusing Planning Permission for the alternative development, ..., of land and buildings currently or last in use for business or industrial purposes within both urban and rural areas unless, it can be demonstrated to the Council that a site is no longer suitable for such use [including various criterion]</p> <p>D. Identifying Strategic Employment Zones within the Allocations DPD and Area Action Plan DPD's</p> <p>E. Supporting priority business sectors and clusters through the provision of appropriately located sites and premises.</p> <p>F. Encouraging economic enterprises which develop or enhance the viability of tourism, culture and leisure based activities,...</p> <p>G. Promoting developments which help diversify and strengthen the rural economy...</p> <p>H. Supporting the provision of live- work premises.</p> <p>I. Ensuring that new developments of more than 1000 sq metres of non residential floorspace will meet 'BREEAM Very Good' standards on buildings and by 2019 will meet 'BREEAM EXCELLENT' <i>unless, having regard to the type of development involved and its design, this is not feasible or viable.</i></p> <p>The policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p> <p>We note that the Council is to ensure that non-residential development meets BREEAM Very Good or Excellent. This is a cost to developers. However, this requirement is not an absolute requirement and can be waived on a site by site basis if it is not feasible or viable. We have not explicitly appraised commercial uses as there is no CIL. In the future occupiers will be more demanding of higher specification buildings and developers will be expected to deliver these standards.</p>

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<p><b>Policy EC5: City, Town, District and Local Centres</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This policy is to seek to sustain and enhance the vitality and viability of a network and hierarchy of centres in the Bradford District... by ensuring that new, appropriate scale of retail, leisure and office development is encouraged in sequentially preferable locations.</p> <p>Allocations, designations and associated development management policies on centre boundaries, primary shopping areas, primary and secondary shop frontages and sites (expansion areas) to meet at least the first five years of identified need will be determined by the Allocations DPD, Bradford City Centre Area Action Plan DPD and the Shipley and Canal Road Corridor Area Action Plan DPD.</p> <p>This policy confirms that:</p> <ul style="list-style-type: none"> <li>A. Bradford City Centre should be the focus for a wide diversity of economic activity, including significant offices, residential, convenience and comparison retail including the traditional (and specialist) markets, leisure, entertainment, arts, culture, tourism, intensive sports and recreation uses and the priority centre for promotional events and activities.</li> <li>B. Keighley, Ilkley, Bingley and Shipley Town Centres should be the focus for office, residential, convenience and comparison retail, including the traditional (and specialist) markets, leisure, entertainment, arts, culture and tourism, intensive sports and recreation uses that are appropriate to the centres....</li> <li>C. The District Centres of Five Lane Ends, Girdlington, Great Horton, Greengates, Thornbury, Tong Street, should be the focus for convenience retail and limited comparison retail and a range of non retail services such as banks, building societies, restaurants, cafes and local public facilities....</li> <li>D. The (46) Local Centres within urban areas and villages should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people's day to day needs and minimise their need to travel.</li> <li>E. A new Local Centre will also be required as part of the Holme Wood Sustainable Urban Extension.</li> </ul>



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			<p>[This will be managed by:]</p> <ol style="list-style-type: none"> <li>1. The sequential test will apply,...</li> <li>2. When assessing applications for retail and leisure development not in accordance with the Development Plan Documents and in an edge of centre or out of centre location, the Council will require an impact assessment if development is over:                         <ul style="list-style-type: none"> <li>• 1,500 square metres gross floorspace for Bradford city centre.</li> <li>• 1,000 square metres gross floorspace for Keighley, Shipley, Bingley, Ilkley.</li> <li>• 500 square metres gross floorspace for District Centres.</li> <li>• 200 square metres gross floorspace for Local Centres.</li> </ul> </li> </ol> <p>The policy includes details of what the retail assessment should include</p> <ol style="list-style-type: none"> <li>F. Retail development will only be permitted outside of the Primary Shopping Areas as defined in the Allocations DPD, Bradford City Centre AAP and Shipley Canal Road Corridor AAP ....subject to specific criteria.</li> <li>G. Proposals for office and other main town centre uses will only be permitted on sites outside the city, town and district centre boundaries (as defined in the Allocations DPD, Bradford City Centre AAP, Shipley &amp; Canal Road Corridor AAP) ....subject to specific criteria.</li> <li>H. Small Shop Units (under 150 square metres gross of floor space) within walking distance of most residential properties will be permitted, provided that the development will not lead to the creation of a shop or group of small shops which collectively would have a significant adverse impact on the vitality and viability of the network and hierarchy of City, Town, District and Local Centres.</li> <li>I. Office, residential uses, community and cultural facilities and services at ground and upper floor levels within the above centres will be encouraged, provided they do not have a significant adverse impact on the retail function of the Primary Shopping Area.</li> </ol>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>J. Healthcare services and educational facilities at ground and upper floor levels within the above centres will be encouraged, provided they do not have a significant adverse impact on the retail function of the Primary Shopping Area.</p> <p>K. Development, environmental enhancements, accessibility improvements, town centre management strategies and promotional events and activities should take place in each of the centres within the District to create distinctive, attractive and vibrant sense of place and identity to be enjoyed and used by all. ...</p> <p>The definition of town centres may have an impact on land values, rents and yields creating distinct market areas. We have undertaken a thorough market analysis to highlight any variation in values and distinguish distinct market areas.</p> <p>Note that for the purposes of differentiating retail CIL, we have used the edge of the settlement boundary rather than the more tightly drawn centre boundaries, primary shopping areas, primary and secondary shop frontages. This is because all sites within the development boundaries are likely to be brownfield and therefore have similar viability characteristics, notwithstanding that this policy would direct retail to within the tighter town centres.</p> <p>We have appraised a set of typologies for retail development with regard to these development sizes. The working assumption where schemes are out-with the designated town centre, but within the development [settlement/urban] boundary is that the typology is likely to be brownfield. Where a scheme is outside the designated town centre and outside the development boundary then this typology is likely to be greenfield.</p> <p>This enables us to differentiate where there is new retail development on greenfield sites e.g. Holmewood.</p>
<p><b>Policy TR1: Travel Reduction and Modal Shift</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>The Council through planning and development decisions and transport policies will aim to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, support the development of healthy streets, limit traffic growth, reduce congestion and air pollution and improve journey time reliability.</p>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>The Council will support the delivery these strategic transport priorities through application of various criteria....including, inter alia:</p> <ul style="list-style-type: none"> <li>• the need for all major developments to provide an approved transport assessment statement in accordance with the NPPF / PPG;</li> <li>• All major development proposals will be required to provide appropriate facilities and levels of cycle parking...</li> </ul> <p>We consider that these requirements are included within our normal development costs herein (e.g. standard professional fees for a TA, and garages etc for cycle parking).</p>
<p><b>Policy TR2: Parking Policy</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>The Council will seek to manage car parking to help manage travel demand in an effort to support the use of sustainable travel modes, improve accessibility for all and the quality of place.</p> <p>This includes various mechanisms.</p> <p>This policy sets out the factors which will be important for parking provision and management for cars and other vehicles to minimise congestion, encourage sustainable transport modes and reduce conflict between road users.</p> <p>This is a trade off because as (apartment) scheme become higher density, there becomes more units and therefore potentially greater car parking demand. This can only be delivered either on the surface (reducing density) or via under-croft (or basement) parking which increases construction costs and impacts viability. We have taken this into consideration through the application of the relevant density assumption(s).</p>
<p><b>Policy TR3: Integrating Sustainable Transport and Development</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>The Council will promote sustainable travel in new developments arising through the Allocations DPD and planning applications.</p> <p>This is by supporting various mechanisms including design and access statements.</p> <p>We consider that these requirements are included within our normal development costs herein (e.g. preparation of D&amp;A statements).</p>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
<b>Policy TR5: Strategic Transport Delivery</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy is to support and prioritise programme of strategic improvements as outlined in greater detail in the West Yorkshire Transport Strategy 2040 and the forthcoming Bradford Transport Strategy 2040.</p> <p>This policy is to maintain and protect transport routes offering opportunities for future infrastructure improvements and sustainable travel. There are no specific cost implications associated with this policy and therefore does not have a direct impact on viability.</p>
<b>Policy TR4: Transport and Tourism</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	<p>The Council through planning and development decisions and transport policies will support sustainable access to tourist destinations, heritage and cultural assets and leisure uses. This is through various measures.</p> <p>This policy to enable sustainable growth in tourism. There is no direct impact on the value/cost assumptions in respect of our appraisals.</p>
<b>Policy TR6: Freight</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>The District will encourage the development of an integrated freight distribution system, in line with the West Yorkshire Transport Strategy 2040 and Bradford Transport Strategy 2040, that makes the most efficient and effective use of all modes of transport subject to environmental considerations including the need to protect and enhance residential areas and locally, regionally, nationally and internationally important biodiversity sites.</p> <p>The policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>
<b>Policy TR7: Transport Investment and Management Priorities</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	<p>This policy set out the Transport Investment and management priorities of the District.</p> <p>The policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>

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Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
<b>Policy TR8: Aircraft Safety</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	Development proposals that create a hazard to the safe operation of aircraft, aerodromes or aircraft navigation facilities will not be permitted.  No impact on plan viability.
<b>Policy HO1: The District's Housing Requirement</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	This sets out that provision will be made within the Local Plan to facilitate a housing requirement of 28,951 new homes over the plan period 2020-2037.  The policy also references the allocation of sites to accommodate this growth.  The policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.
<b>Policy HO2: Strategic Sources of Supply</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	This policy sets out how the housing requirement will be met through: A. <ol style="list-style-type: none"> <li>1. Housing commitments with planning permission at 31<sup>st</sup> March 2020 including from partly developed sites.</li> <li>2. Additional new deliverable and developable sites allocated for housing development within the Local Plan Development Plan Documents...</li> <li>3. A windfall allowance of 300 units per annum over 15 years</li> </ol> B. Specific area-based initiatives to help deliver the supply targets will include: <ol style="list-style-type: none"> <li>1. Regeneration of Bradford City Centre, to include support for the intensification of residential development.</li> <li>2. Development of Shipley and Canal Road Corridor.</li> <li>3. Regeneration initiatives within Bradford ...</li> </ol>

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Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>4. Regeneration of Keighley</p> <p>5. A Sustainable Urban Extension at Holme Wood</p> <p>6 Limited Green Belt releases ...</p> <p>The policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>
<p><b>Policy HO3: Distribution of Housing Development</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>Similarly, this policy set the distribution of housing development. It apportions the growth between the different settlements and sub areas of the District.</p> <p>The Council will take a positive approach in supporting additional development on windfall sites which accord with the policies.</p> <p>Also, the Council will support proposals within Neighbourhood Plans which seek to provide for additional housing development over and above the levels indicated within this policy.</p> <p>We have used this policy (and the proposed site allocations) to inform the development typologies which have been agreed with the Council. Given that this policy recognises where future development should be located it will have an indirect impact on land and residential values through the price mechanism. We have used current costs and current values in our appraisals based on market research which identifies distinct market areas.</p>
<p><b>Policy HO4: Managing Housing Delivery</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the release of land within the Local Plan will be managed and phased where appropriate.</p> <p>This will impact the supply of sites which will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
<p><b>Policy HO5: Density of Housing Schemes</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Direct</p>	<p>This policy is to ensure that developers make the best and most efficient use of land.</p> <p>The policy states that:</p> <p>A. All developments should achieve a minimum net dwelling density of 35 dwellings per hectare, and at least 50 dwellings per hectare net in areas which are well served by public transport and local amenities; and</p> <p>B. Locations in/or close to the City Centre and Principal Towns and locations close to railway stations should achieve significantly higher densities.</p> <p>This is an important policy with a direct impact on viability as it determines how many units can fit onto any particular site. For the purposes of our appraisal of the hypothetical scheme typologies it is important to determine the quantum of land required in order to calculate the BLV (Benchmark Land Value).</p> <p>Our typologies matrix has been agreed with the Council to reflect these density requirements. Thus, the notational site area and therefore BLV is based on the number of units in the typology and the relevant density assumption.</p> <p>In this respect we have generally appraised typologies based on 35 dph. We have appraised some additional typologies based on 50 dph and included a higher density flatted type development as part of the typologies. We have also incorporated sensitivity analysis on all typologies between 25 – 55 dph.</p>
<p><b>Policy HO6: Maximising the use of Previously Developed Land</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Direct</p>	<p>This policy is to specifically achieve the maximum possible re use of previously developed land. This includes a target that 50% of the Allocations DPD will be on previously developed land.</p> <p>Also, the Council will monitor performance against these targets and will take action if performance slips outside of the defined acceptable ranges.</p> <p>In this respect we have explicitly modelled brownfield typologies in order to make recommendations in respect of the affordable housing, CIL and other S106 obligations on brownfield sites.</p>

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Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
<p><b>Policy HO7: Housing Site Allocation Principles</b></p>	<p>Local Plan for the Bradford District, Core Strategy (Adopted July 2017)</p> <p>Has not been reviewed as part of the CSPR</p>	<p>Indirect</p>	<p>This policy sets out the principles of allocating sites including:</p> <ul style="list-style-type: none"> <li>A. The need to allocate sufficient deliverable and developable sites to meet the Targets..;</li> <li>B. Prioritising the allocation of sites which would assist in the regeneration of the Plan area;</li> <li>C. Maximising the use of previously developed land ..;</li> <li>D. Prioritising the allocation of sites which would remedy identified deficiencies in local infrastructure and services including open space, community and education facilities;</li> <li>E. Minimising the use of green belt land within the Plan area;</li> <li>F. Maximising positive environmental benefits ...</li> <li>G. Minimising adverse environmental impacts of housing growth..</li> </ul> <p>This will impact the supply of sites which will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g. land) over time through the price mechanism.</p>
<p><b>Policy HO8: Housing Mix</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Direct</p>	<p>This policy requires:</p> <ul style="list-style-type: none"> <li>A. ..that a mix and balance of housing is provided to meet the needs of the District....</li> <li>B. All major residential development sites where 10 or more homes will be provided or the site has an area of 0.5 hectares or more will be expected to incorporate a mix of housing types, sizes, prices and tenures. The exact mix should be based both on market demand and evidence of local need <i>within the District's SHMA</i> together with any other robust local evidence or information.</li> </ul>



Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>The location and nature of the site and its surroundings and the profile of the existing stock in the area should also be considered.</p> <p>C. Specific guidance on housing mix on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley &amp; Canal Road AAPs and Neighbourhood Plans.</p> <p>D. Within the District there will be a need for all types and sizes of housing but there should be a particular emphasis of the following strategic priorities:</p> <ol style="list-style-type: none"> <li>1. Delivering more family housing across the District;</li> <li>2. Delivering sufficient affordable housing ....</li> <li>3. Increasing the supply of larger homes across the District, particularly in areas suffering from high levels of overcrowding;</li> <li>4. Increasing the supply of accessible housing which is able to meet people's needs throughout their lives;</li> <li>5. Increasing the supply of high quality flats, particularly in city and town centres and accessible locations;</li> <li>6. Supporting the provision of specialist accommodation for older people .....</li> </ol> <p>E. The council will <i>encourage</i> and support proposals for self and custom build housing....</p> <p>F. The council will <i>support and encourage</i> proposals that meet an identified local need for specialist housing for particular groups with specific needs.</p> <p>This policy has a direct impact on viability as it determines the mix and types of development which would result in a direct impact on viability.</p>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>There is an updated policy position on housing mix and type within the Strategic Housing Market Assessment (2019). These percentage requirements on new developments are used as an indicative guide for our typologies matrix which has been agreed with the Council before running the appraisals.</p> <p>An appropriate housing mix has been developed for a range of site typologies to be tested based on evidence in the SHMA and consideration of housing need and demand in the District.</p>
<p><b>Policy HO9: Housing Quality</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Direct</p>	<p>This policy requires:</p> <ul style="list-style-type: none"> <li>A. New housing development should be high quality and achieve good design.... The Homes and Neighbourhoods Design Guide SPD identifies how the quality of residential development proposals will be assessed.</li> <li>B. The Council will <i>encourage and support</i> new residential developments to achieve high sustainable design and construction standards. The minimum acceptable sustainable housing standards are set out in the <i>Building Regulations</i>.</li> <li>C. To provide suitable housing and genuine choice for the District’s diverse population housing sites should include a proportion of new homes which are designed to be <i>accessible and easily adaptable</i> to support the changing needs of families and individuals over their lifetime, including older people and people with disabilities.                         <ul style="list-style-type: none"> <li>1. New build residential developments should include the following proportions of accessible homes:                                 <ul style="list-style-type: none"> <li>All new build dwellings should meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.</li> <li>On major development sites over 0.5 hectare or 10 or more homes 10% of dwellings should meet the Building Regulations requirement M4(3) ‘wheelchair user dwellings’, designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.</li> </ul> </li> </ul> </li> </ul>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<ul style="list-style-type: none"> <li>2. Where it can be robustly justified that site-specific factors, such as flood risk, site topography or viability make a site unsuitable for either M4(2) and/or M4(3) compliant homes the requirements of this policy should not apply.</li> <li>3. The mix of sizes, types and tenures of accessible housing should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional accessible housing in a particular tenure).</li> <li>4. The required number and mix of accessible homes should be clearly illustrated on submitted plans and controlled via a planning condition.</li> <li>D. New development should provide private outdoor space for homes, unless site constraints make this clearly unfeasible and/or unviable.</li> <li>E. All new homes should be well laid out internally and should provide suitable space standards appropriate to the type of home. Rooms should receive adequate levels of daylight.                         <ul style="list-style-type: none"> <li>1. All new market and affordable homes should, as a minimum, meet the Nationally Described Space Standard (NDSS) for internal space in new dwellings.</li> <li>2. Proposals for change of use, student accommodation and houses in multiple occupation will not be subject to the NDSS. ...</li> </ul> </li> <li>F. New development should provide well designed storage solutions for bins, recycling and cycles. These should be located or designed in a way which is convenient for all residents including elderly and infirm and supports the quality of the street scene. The council will encourage the use of new and innovative waste collection systems including underground bin systems where appropriate and feasible. In particular, on larger strategic sites and developments of 1000 properties or more or for high density developments.</li> <li>G. Specific non-strategic policies and guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, Bradford</li> </ul>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>City Centre and Shipley &amp; Canal Road AAPs, The Homes and Neighbourhoods Design Guide SPD and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so and reflect the relevant national technical standards.</p> <p>This policy sets out design principles that new development should follow in order to ensure the District's different characteristics and qualities are maintained and enhanced. There is therefore a direct impact on the construction cost. Notwithstanding this, the minimum design standard is the Building Regulations and therefore the cost of compliance is reflected in the BCIS costs that we have used within our appraisals. Note also that good design leads to high quality environments which are reflected in the value of real estate. We have used current values (and costs) within our appraisals.</p> <p>We have applied the Nationally Described Space Standard (NDSS) within our appraisals.</p> <p>M4(2) Category 2 - Accessible and adaptable dwellings – are dwellings that provide a higher level of accessibility that is beneficial to a wide range of people who occupy or visit the dwelling, and provides particular benefit to older and disabled people, including some wheelchair users.</p> <p>M4(3) Category 3 - Wheelchair user dwellings – are dwellings that are suitable, or potentially suitable through adaptation, to be occupied by wheelchair users.</p> <p>This has a cost implication for development. In addition to the baseline BCIS construction costs we have made extra-over allowance for these optional Building Regulations requirements to demonstrate that this is achievable:</p> <ul style="list-style-type: none"> <li>+ £521 per unit for accessible and adaptable housing M4(2) Category 2</li> <li>+ £10,111 per unit for wheelchair adaptable dwellings M4(3) Category 3.</li> </ul> <p>This is based on the DCLG housing Standards Review, Final Implementation Impact Assessment, March 2015, paragraphs 153 and 157.</p>

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Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
<b>Policy HO10: Overcrowding and Empty Homes</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  <b>Has not been reviewed as part of the CSPR</b>	Indirect	This policy is about improving the quality of the existing housing stock.  There is no direct impact on plan viability.
<b>Policy HO11: Affordable Housing</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Direct	This policy requires: <ul style="list-style-type: none"> <li>A. The council will work with partners to ensure that there is a sufficient supply of good quality affordable housing ...</li> <li>B. On major residential developments, affordable housing provision that meets identified local needs should be provided at the target levels specified below:               <ul style="list-style-type: none"> <li>• 30% in Wharfedale</li> <li>• 20% in towns, suburbs and villages</li> <li>• 15% in inner Bradford and Keighley</li> </ul> <p>Affordable housing should be provided on-site and be indistinguishable from and well-integrated with market housing, unless off-site provision or a financial contribution in lieu of on-site provision can be robustly justified and would support the creation of inclusive and mixed communities.</p> </li> <li>C. Affordable housing contributions will be required on all major developments of 10 or more homes or on sites over 0.5 hectares in area.</li> <li>D. The Council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability. The following tenure mix will be the starting point for all affordable housing negotiations:</li> </ul>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<ul style="list-style-type: none"> <li>• 65% affordable housing for rent</li> <li>• 35% affordable home ownership products</li> </ul> <p>E. Where an applicant can provide robust, up to date and verifiable evidence to support the view that a site would be unviable if affordable housing targets are required then the exact amount of affordable housing, or financial contribution to be delivered, will be determined by economic viability having regard to individual site conditions.</p> <p>Rural Affordable Housing</p> <p>F. Consideration will be given to allocating rural exception sites...</p> <p>G. The criteria for assessing speculative proposals for rural exceptions via planning applications will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the Green Belt....</p> <p>Our scheme typologies matrix and viability appraisals are specifically designed to test the viability of this policy in the context of the cumulative impact of all of the new policies herein. The drafting of this policy is an iterative process having regard to the results of the viability appraisals and specifically the sensitivity appraisals.</p> <p>Note that in accordance with the PPG, policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision-making stage. (Paragraph: 002 Reference ID: 10-002-20190509, Revision date: 09 05 2019)</p>
<p><b>Policy HO12: Sites for Gypsies, Travellers and Travelling Showpeople</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Indirect</p>	<p>This is a specific policy to meet the accommodation needs of Gypsies and Travellers. The Council will make provision via policies and site allocations to deliver at least: 10 pitches for the gypsy and traveller communities; and 5 pitches for transit accommodation.</p>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
<b>Meeting Future Need</b>			This is not a large sector of the property market and therefore the supply of these sites will have limited, if any impact, on viability. Cost and value assumptions and land supply / price should be monitored for future reviews.
<b>Policy EN1: Protection and improvements in provision of Open Space and Recreation Facilities</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Direct	<p>This policy is in respect of:</p> <ul style="list-style-type: none"> <li>A. ... protecting existing open space from development.</li> <li>B. Provision of Open Space and Recreation Facilities – where Housing developments will be required to provide for new or improved open space, sport and recreational facilities through:                             <ol style="list-style-type: none"> <li>1. The provision of new open space, preferably on-site,</li> <li>2. A contribution to the provision of new open space off-site; or</li> <li>3. The enhancement of existing open space nearby</li> </ol>                             And; When identifying land for development involves the release of greenfield or green belt land, identified deficiencies in recreation open space within the local area will need to be addressed, in addition to meeting the needs of future residents. And; Green Infrastructure, recreation facilities and open space, including playing pitches and natural greenspace, to meet existing and future needs will be identified in the proposals maps of Local Plan documents.                         </li> <li>C. Mitigating Recreational Pressure on the South Pennine Moors SPA and SAC</li> <li>D. ..identifying and protecting areas of Local Green Space ..</li> <li>E. Where major development is proposed in an area with a clearly identified deficiency, in either the quality or quantity, of built recreation facilities, contributions may be required to secure provision of new or enhanced facilities.</li> <li>F. Standards of Provision and Maintenance for the future.</li> </ul> <p>This policy is to promote health, wellbeing and equality by safeguarding and improving open space. The policy outlines the need for a contribution from new residential development towards the provision of open space. This is taken into consideration within our viability assessment through:</p>

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Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<ul style="list-style-type: none"> <li>the net-to-gross developable area assumptions as part of the BLV calculations;</li> <li>the density assumption (dph) which is to allow for the relevant open space;</li> <li>External works costs which allow for relevant open space costs;</li> <li>Site specific S106 contributions (see Typologies Matrix).</li> </ul>
<b>Policy EN2a: Biodiversity and Geodiversity</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Direct	<p>This policy is for the protection, enhancement, restoration and expansion of biodiversity and geodiversity in the District.</p> <p>This includes various international, national, regional and local designated sites and measures for their protection.</p> <p>Costs associated with these requirements are included within our use of appropriate local construction cost benchmarks and external works cost benchmarks which developers will take into consideration biodiversity requirements (which developers have been delivering).</p> <p>Note that in the future the government is committed to mandating biodiversity net gain on sites. At the time of this review, this was uncertain. There will be a loss of European Directives following Brexit but the UK is a signatory of the Berne, Bonn and Ramsar conventions, which underpin the Birds and Habitats Directives.</p> <p>For the purposes of our plan viability assessment the Biodiversity net gain/habitats charge has been included in the overall £4000/unit S106 assumption.</p>
<b>Policy EN3: Historic Environment</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Direct	<p>The Council, through planning and development decisions, will work with partners to proactively preserve, protect and enhance the character, appearance, archaeological and historic value and significance of the District's designated and undesignated heritage assets and their settings. This is to be achieved to various mechanisms listed in the policy.</p>



Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>This policy has a direct impact on our viability assessment given that there is a cost associated with these policy requirements from developments in conservation areas and other historic environment assets.</p> <p>We have used current costs based on the BCIS and rebased them to Bradford which take into consideration costs of 'typical' development across the District. We acknowledge that construction costs are likely to be higher within designated heritage environments, but values are also likely to be higher. Furthermore, developments involving heritage assets are likely to require a bespoke approach to viability e.g. enabling development and/or grants.</p>
<b>Policy EN4: Landscape</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	<p>This policy requires that Development Decisions as well as Plans, policies and proposals should make a positive contribution towards the conservation, management and enhancement of the diversity of landscapes.</p> <p>There is no direct impact on plan viability.</p>
<b>Policy EN5: Tree and Woodlands</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>The policy is to encourage native tree planting and woodland creation, with a view to enhancing biodiversity. Costs will be considered as part of the biodiversity net gain.</p> <p>There is no direct impact on plan viability.</p>
<b>Policy EN6: Energy</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>This policy is to</p> <p>A. ... maximise improvements to energy efficiency and support the development of decentralised, renewable and low carbon sources of energy (electricity and heat) by:</p> <ol style="list-style-type: none"> <li>1. Identifying suitable areas and opportunities for low carbon and renewable energy developments.</li> <li>2. Ensuring that future development takes place in locations and at a scale that can make a positive contribution to the district's capacity for renewable and low carbon energy.</li> </ol>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>B. The Allocations DPD, Bradford City Centre AAP and the Shipley and Canal Road Corridor AAP will set out local requirements for the use of decentralised energy and the sustainability of buildings. These requirements will promote the maximum use of decentralised energy in areas of greatest opportunity, while taking into account <i>viability and feasibility</i>.</p> <p>C. All proposals for renewable and low carbon energy generation must include a full assessment of the environmental, economic and social impacts ...</p> <p>While the council supports and encourages decentralised and low carbon developments and sustainable design and construction in new developments, the policy does not currently require a local sustainable standard over and above those set through building regulations.</p>
<p><b>Policy EN7: Flood Risk</b></p>	<p>Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019</p>	<p>Direct</p>	<p>This policy requires that:</p> <p>A. The Council will manage flood risk pro-actively through plan making and in assessing proposals for development. In particular, it will:</p> <ol style="list-style-type: none"> <li>1. Direct development to areas with the lowest risk of flooding. ...</li> <li>2. Ensure that development proposals: address all sources of flooding; do not increase flood risk elsewhere; and take account of the need for improved drainage infrastructure.</li> <li>3. Require applications to be supported by a site-specific flood risk assessment ...</li> <li>4. Ensure that any new development in areas of flood risk is appropriately resilient and resistant and made safe for its lifetime without increasing the flood risk elsewhere.</li> <li>5. Require space for the storage of flood water within Flood Zones 2 and 3a.</li> <li>6. Safeguard areas which have the potential to increase flood storage provision and improve defences within the Rivers Aire and Wharfe corridors.</li> </ol>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			<p>7. Manage and reduce the impacts of flooding within the beck corridors, ..</p> <p>8. Adopt a holistic approach to flood risk in the Bradford Beck corridor...</p> <p>9. Seek to minimise surface water run-off from new development:</p> <p style="padding-left: 20px;">a) on Brownfield sites drainage proposals will be measured against the existing performance of the site but will be encouraged to reduce runoff rates by at least 30%.</p> <p style="padding-left: 20px;">b) on Greenfield sites there should be no change to the existing overall run-off rate and where possible improvements should be made to reduce it.</p> <p>10. Require surface water to be drained on a separate system,..</p> <p>11. Require major developments, and where appropriate all other developments, to incorporate SuDS ...</p> <p>12. Use flood risk data to inform decisions made about Green Infrastructure.</p> <p>13. Identify opportunities and support proposals for natural flood management, ....</p> <p>14. Only support the use of culverting for ordinary water courses, and additional flood defence works that could have adverse impacts on the environment, in exceptional circumstances.</p> <p>B. The Council will not permit development in areas which are within the functional floodplain (Flood Zone 3b) as defined in the <i>most up-to-date</i> SFRA with the exception of water compatible uses and essential infrastructure.</p> <p>This policy is to ensure the appropriate management and treatment of surface and foul water disposal to reduce the flood risk in the District. It states that development proposals should include the use of sustainable drainage systems. There are associated costs with this policy and therefore it has a direct impact on viability. It is important to stress that developers should consider drainage solutions at the outset of their scheme design and factor in the costs when acquiring sites.</p>

# CONSULTATION DRAFT

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			We have included an appropriate allowance for external works costs within our appraisals.
<b>Policy EN8: Environmental Protection</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Indirect	<p>In order to protect public health and the environment the Council will require that proposals which are likely to cause pollution ..., will only be permitted if measures can be implemented to minimise pollution and risk to a level that provides a high standard of protection for health, environmental quality and amenity. The following issues require particular attention:</p> <ul style="list-style-type: none"> <li>A. Air Quality</li> <li>B. Land</li> <li>C. Nuisance</li> <li>D. Water Environment</li> </ul> <p>This policy is to ensure the necessary protection of the District's environment, and public health and safety.</p> <p>Any costs associated with environmental protection should be deducted from the site purchase price based on the 'polluter pays' principle.</p>
<b>Policies EN9 – EN12: Minerals</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	No direct impact on viability.
<b>Policies WM1 and WM2: Waste</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)	Indirect	No direct impact on viability.

# CONSULTATION DRAFT

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
	Has not been reviewed as part of the CSPR		
<b>Policies WM1 and WM2: Design</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Direct	None of these policies are being reviewed.  The cost of developing to these policies is embedded in the BCIS costs which we have applied for our appraisals.  Good design is expected to be a key part of the costs of developing a scheme and will be considered through the professional fee's costs. As set out in the Housing Design Guide SPD achieving well designed schemes should not result in significant costs increases if considered early in the design process. In addition, developments of high design quality should see an increase in value (1602 RICS Placemaking and Value 1st Edition February 2016)
<b>Policy ID1: Development Plan Documents and Annual Monitoring Report</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Indirect	No direct impact on viability.
<b>Policy ID2: Viability</b>	Bradford Core Strategy Partial Review (CSPR), Preferred Options, Regulation 18, July 2019	Direct	Viability will be considered as part of the plan-making process. The Council will only consider the viability of development proposals at the planning application stage where: <ul style="list-style-type: none"> <li>A. Required planning obligations are in addition to those considered as part of the Whole Plan Viability Assessment; or</li> <li>B. Where it can be demonstrated there are exceptional site-specific viability issues not considered as part of the Whole Plan Viability Assessment. Where this occurs; applicants should submit a viability assessment. This should be based on the requirements outline in the Planning Practice Guidance on Viability, with an "open book" approach being adopted in order to allow for a full review of evidence and maintain transparency.</li> </ul>

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			This is the purpose of the viability assessment herein.
<b>Policy ID3: Developer Contributions</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSPR	Direct	The policy required that:  Development proposals will be expected to contribute towards the cost of providing infrastructure and of meeting social and environmental requirements, where directly related to the proposed development, and fairly and reasonably related in scale and kind to the development.  A. Through planning application discussions the Council will negotiate the contribution to be secured through a planning obligation. The nature and scale of the contribution sought will be determined having regard to the: 1. Scale and form of development; 2. Capacity of existing infrastructure provision; and 3. Potential impact of the development upon the surrounding area and facilities. 4. Opportunity to support the public sectors equality duty 5. Economic Viability The appropriate range and level of contributions will be assessed in a comprehensive manner, taking into account the above criteria, strategic infrastructure requirements and, where appropriate, the use of standard charges and formula.  B. Where development has a significant impact on the Strategic Road Network developer contributions will be sought through Section 278 agreements.  C. Where a Community Infrastructure Levy is in place, contributions will be made in line with the adopted CIL charging schedule.  We have taken into consideration the cumulative impact of the current developer contributions (affordable housing, CIL, S106) in order to test the viability of the CSPR and CIL Charging Schedule and make any recommendations for changes to policy.

# CONSULTATION DRAFT

Policy	Plan Document (for reference)	Impact on Viability *	Implications for CIL Viability Assessment
			The £4,000 per unit is considered to include all potential developer contributions in the CSCR including education, habitats, highways and recreation. This represents a significant uplift on the previous viability per unit assumptions to reflect the emerging CSCR and CIL review and will therefore provide clear evidence that the scale of obligations required will be deliverable.
<b>Policies ID4 – ID8: Implementation and Delivery Policies</b>	Local Plan for the Bradford District, Core Strategy (Adopted July 2017)  Has not been reviewed as part of the CSCR	Indirect	None of these policies are being reviewed.  No direct impact on viability.

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