

Bradford Local Plan – Shipley & Canal Road Corridor Area Action Plan DPD

Duty to Cooperate Statement

April 2016

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1. Leeds City Region Statement of Cooperation for Local Planning
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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 Shipley & Canal Road Corridor 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 Shipley & Canal Road Corridor 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

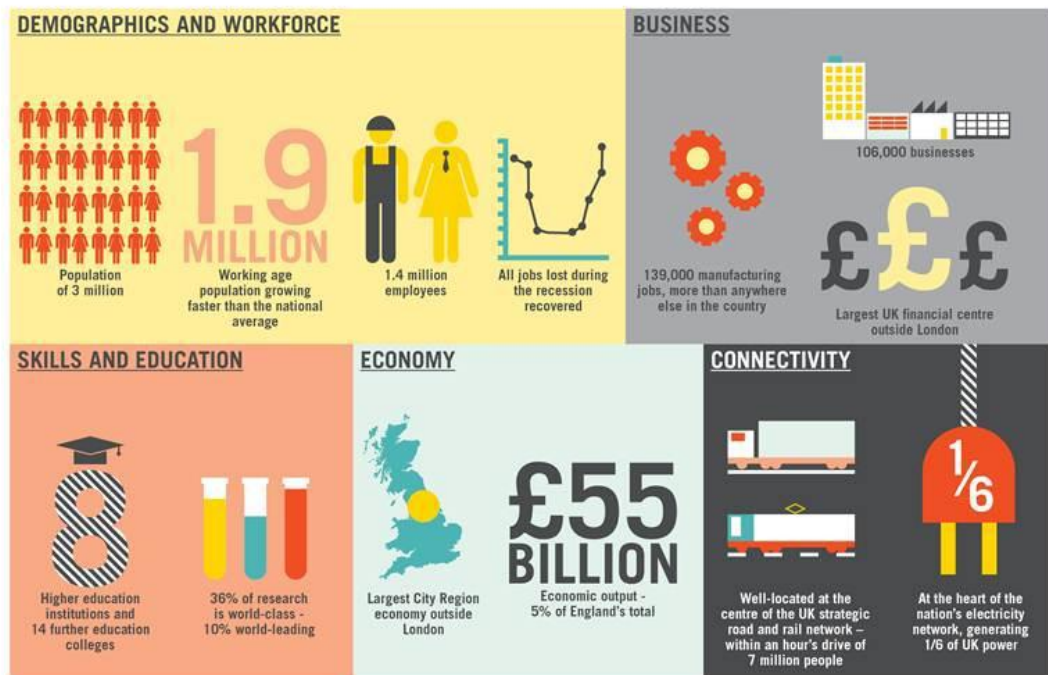


Leeds City Region

- 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

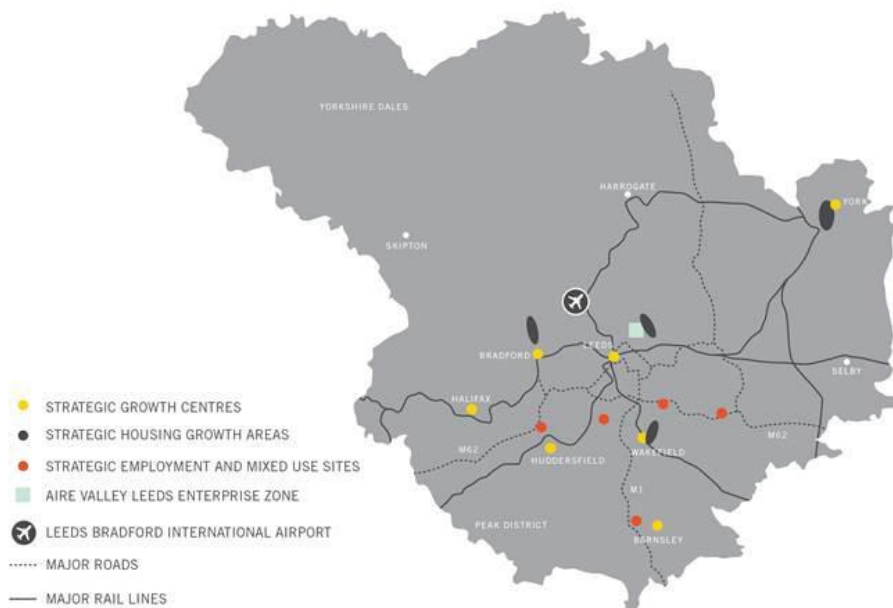
strong and clear analysis of the local economy and the barriers and opportunities that it faces;

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

- 3.6 The Strategic Economic Plan (SEP) aims to unlock the full economic potential to become the growth engine for the north.
- 3.7 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.
- 3.8 Connectivity and improvements to transport are a key element of the SEP and subsequent Growth Deal.
- 3.9 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

OUR SPATIAL PRIORITIES



(Source; LCR SEP 2014)

- 3.10 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.
- 3.11 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)**.
- 3.12 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.
- 3.13 In July 2012 a ‘City Deal’ was agreed with government to boost jobs and growth, with Leeds City Region

- 3.14 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.
- 3.15 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
- 3.16 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.
- 3.17 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.
- 3.18 These characteristics and what they mean for strategic planning are explored further below.
- 3.19 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.
- 3.20 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.
- 3.21 The Airedale corridor links a string of communities from South Craven to the north through to Leeds in the east.

Population

- 3.22 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

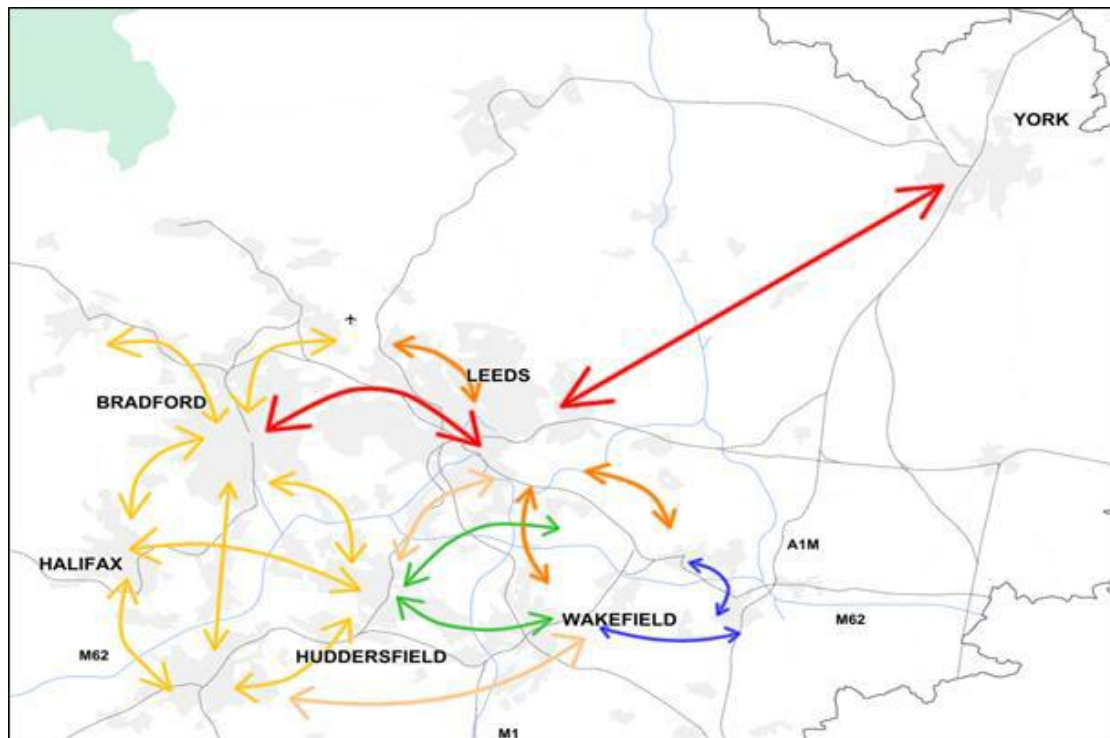
- 3.23 Bradford is ranked high in the Index of Multiple Deprivation rank Bradford. It has the biggest gap between the ranking of its most deprived and its least deprived neighbourhoods. The most deprived areas in the district are concentrated in the inner city areas such as Manningham and Bradford Moor, and in Keighley.
- 3.24 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

- 3.25 Bradford has the third largest economy in Yorkshire and the Humber behind Leeds and Sheffield. Bradford contributes £7.6bn to the UK economy.
- 3.26 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.
- 3.27 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.
- 3.28 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.

- 3.29 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.
- 3.30 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.
- 3.31 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.
- 3.32 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.
- 3.33 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)

- 3.34 **The Shipley and Canal Road Corridor has been identified by the Council as an area with significant regeneration potential.** Plans for the comprehensive regeneration of the Corridor were identified in 2006, when the Council undertook studies into the feasibility and regeneration benefits of re-instating the Bradford Canal.
- 3.35 A masterplan aimed at maximising the regeneration potential of the Corridor, through the reinstated Bradford Canal was produced. The Bradford Canal Road Masterplan aimed to facilitate the development and implementation of the canal whilst capitalising on the regeneration and development opportunities, which the reinstated canal would bring.
- 3.36 Since the publication of the masterplan in 2006, further work has been undertaken into the feasibility of regenerating the Corridor. **A Joint Venture Company called Canal Road Urban Village Ltd (CRUVL) has been established between the Council and Urbo Regeneration Ltd,** and further detailed work has been undertaken.
- 3.37 This has included the production of the Shipley and Canal Road Corridor Strategic Development Framework commissioned by the Council and the New Bolton Woods Masterplan by CRVUL. These have informed the AAP approach.

Key drivers for change

- 3.38 There are a number of strategic factors that are influencing the need for change within the Corridor. These are:
1. The Corridor's strategic location for new development and its potential to make a significant contribution to the regeneration of the District.
 2. The identification of the area as one of four Urban Eco Settlements in the Leeds City Region.
 3. The major challenges facing the Bradford District including:
 - an economy which needs to be much stronger
 - a growing population which will need more jobs and more housing
 - the need to create sustainable and resilient communities
 4. The need to meet the development needs of the District and deliver sustainable development in accordance with the Bradford District Core Strategy.
- 3.39 The Shipley and Canal Road Corridor is located within the main urban area of Bradford, stretching from the city centre to Shipley town centre. Canal Road itself is a major strategic route within the sub-region, linking areas within the Bradford District and beyond.
- 3.40 The **Corridor is a traditional employment corridor as well as being a key transport route northwards into and out of the city, forming a gateway into Airedale and beyond.** Traditionally a mixed employment area, the Corridor developed out of its close proximity to the Bradford Canal and the railway line.
- 3.41 The Corridor is today characterised by a range of uses. The central area around Bolton Woods has a variety of uses including existing residential communities and areas of employment, mainly located alongside Canal Road. To the south, the area has a predominance of retail, business and commercial uses, which link to Forster Square retail area. The northern section includes Shipley town centre and business and residential areas to the east of Shipley around Dockfield Road and Crag Road.
- 3.42 The Corridor itself is relatively flat but is defined by a steep valley side to the east. The Bradford Beck watercourse flows south to north along the length of the Corridor, though for much of its length it is in culvert. The Shipley to Bradford Forster Square railway line defines the western edge of the area.
- 3.43 There are a number of major features and key areas located within and close to the Corridor that have influenced the approach in the AAP. These include:

Bradford City Centre – The main destination for shopping, leisure and culture and the hub for public, commercial and civic services in the District. A City Centre Area Action Plan is being developed for the city centre.

Shipley Town Centre – Shipley is an important town centre, which is a focus for future investment to deliver major improvements through the expansion of its retail, leisure, office and housing market offer.

Saltaire World Heritage Site- Of international, national and local importance to the District is Sir Titus Salt's model village of Saltaire, which is one of only two UNESCO World Heritage Sites in Yorkshire. Future development must protect and enhance Saltaire's heritage and setting.

Canal Road Urban Village New Bolton Woods Masterplan Site- An 'asset based' Joint Venture Company between the Council and Urbo Regeneration Ltd, with the aim of delivering large scale regeneration within the designated Joint Venture Partnership Area.

Bolton Woods Quarry- A large operational mineral extraction site.

Gaisby Lane & King George Playing Fields- A linear flat area of open land running parallel to Bradford Beck, used for formal and informal recreation and playing fields.

Bradford Beck- a key waterway that flows through the heart of the Corridor.

Brow Wood Crescent and Poplars Farm- Areas of open land which form part of an open space corridor. Includes the steep slopes surrounding Bolton Woods Quarry and a Bradford Wildlife Area.

Employment Zones- Including the Canal Road employment zone and Shipley employment zone to the south of Otley Road.

Forster Square and Valley Road Retail Area- Existing area of large retail units including a Tesco food store and Forster Square Retail Park.

Canal Road- Strategic transport route into and out of the City of Bradford.

Shipley and Frizinghall Railway Stations- Both stations play a key role in offering sustainable transport options along the Corridor. Shipley railway station is a key transport interchange.

Urban Eco Settlements (UES)

- 3.44 The **Corridor has been identified by the Leeds City Region Partnership** as one of four locations offering the potential for an Urban Eco Settlement within the Leeds City Region.
- 3.45 The City Region Partnership has previously considered the case for a freestanding eco town and concluded that it would not offer the most appropriate, sustainable way forward for meeting the city region's housing needs. Instead the Partnership considered that the city region's unique housing and regeneration needs could be better served by delivering eco principles on a number of major regeneration sites within existing urban environments.
- 3.46 A Memorandum of Understanding was developed to work in partnership to develop sustainable urban settlements on major brownfield locations within the heart of some of the city region's major economic and population centres. Four specific areas were proposed as Urban Eco Settlement locations. These were:
- the Bradford Shipley and Canal Road Corridor
 - York Northwest
 - Aire Valley Leeds
 - North Kirklees and South Dewsbury
- 3.47 **The Shipley and Canal Road Corridor has the potential to provide significant numbers of new homes and jobs**, within the City of Bradford. This area is therefore being promoted by the Council and its partners as an Urban Eco-Settlement. The AAP will aim take forward the principles of the Urban Eco Settlement programme and deliver a new sustainable settlement in Bradford of homes built to high environmental standards, in a green and attractive setting, which is well located close to jobs and facilities and will act as an exemplar development. The Council has considered how Eco Settlement principles have been applied in the AAP, taking into account the unique nature of the area, current national planning policy and viability issues. Appendix E sets out how these principles have been taken forward in the AAP.

Joint Venture Company (JVCo)

- 3.48 A Joint Venture Company (JVCo) between the Council and Urbo Regeneration Ltd has been established to support the delivery of comprehensive regeneration in the Corridor. Further work is being undertaken by the JVCo on detailed proposals to deliver the New Bolton Woods Masterplan within the designated Joint Venture Partnership Area in parallel with the AAP.

Housing

- 3.49 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

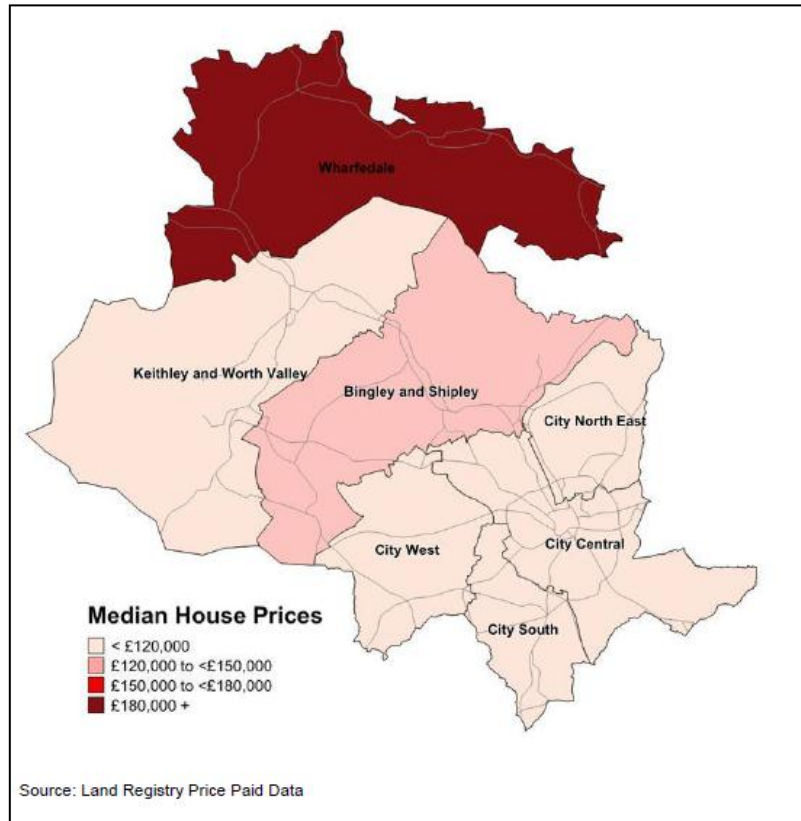
Leeds City Region). The SHMA identifies that there are a number of sub areas within the district which exhibit broadly similar housing market characteristics.

Figure 5 Bradford SHMA Sub Areas



- 3.50 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).
- 3.51 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



- 3.52 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.
- 3.53 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.
- 3.54 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

- 3.55 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.
- 3.56 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.
- 3.57 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.
- 3.58 **The main road and rail routes to the north of the District follow or link Airedale and Wharfedale** and there is also an important network of roads serving Keighley and smaller settlements to the west of the District.
- 3.59 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.
- 3.60 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.
- 3.61 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.

- 3.62 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

- 3.63 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.

- 3.64 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

- 3.65 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.

- 3.66 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

- 3.67 The provision of cultural amenities is good in Bradford and in particular UNESCO World Heritage Site at Saltaire. Visitors are also attracted by the built heritage of the District.
- 3.68 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)

- 3.69 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.
- 3.70 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.
- 3.71 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.
- 3.72 The Government published the updated SEA of the proposed revocation of the Yorkshire and Humber Plan in September 2012.
- 3.73 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.
- 3.74 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.

- 3.75 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.
- 3.76 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.
- 3.77 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.
- 3.78 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.
- 3.79 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'.
- 3.80 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.
- 3.81 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.

- 3.82 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.
- 3.83 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.
- 3.84 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.
- 3.85 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

- 3.86 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

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

Kirklees

- 3.88 Kirklees Draft Local Plan consultation ends on 21 December 2015.

Calderdale

- 3.89 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

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

Harrogate

- 3.91 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

- 3.92 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 Shipley & Canal Road Corridor 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 Strategic Policy 1 seeks to transform the economic, social and environmental conditions of the Canal Road Corridor, Spatial Objective 1 *To recognise and fully exploit the role of the City of Bradford and the towns along Airedale and Wharfedale as dynamic locations of choice for housing and economic growth within the Leeds City Region* provides the context for delivering the Shipley & Canal Road Corridor AAP.
- 4.96 Strategic Policy SC4 and sub area policies BD1 and BD2 establish the strategic planning framework for the Shipley & Canal Road Corridor 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

Scale and location of new land for homes and Shipley Eastern Link Road

- 4.97 Proposals for new homes in the Shipley & Canal Road Corridor 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.
- 4.98 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.
- 4.99 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.
- 4.100 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).

- 4.101 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).
- 4.102 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.
- 4.103 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.
- 4.104 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.
- 4.105 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.
- 4.106 The Council has appointed consultant Arup to provide support on infrastructure planning and provide accurate information across all infrastructure types.

- 4.107 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.
- 4.108 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.
- 4.109 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.
- 4.110 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.
- 4.111 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.

Bolton Woods Quarry

- 4.112 The redevelopment of the quarry could have a potential impact due to diminishing locally sourced building material. However, The Quarry is proposed for redevelopment as housing site so it will come to the end of its operational life during the AAP plan period.

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 Saltaire World Heritage Site. The Council with its partners, Historic England has produced a Heritage Assessment in support of the AAP.

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 Shipley & Canal Road Corridor 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 buy 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.