

Report to the Planning Inspector regarding flaws in the research underpinning Bradford's Local Plan - Bradford wide



Date: 19th February 2015

This report updates information in one of my previous submissions to take account of further material presented by Edge Analytics. It shows, as my earlier submission did, that the Local Plan that is being proposed by Bradford Metropolitan District Council is fundamentally unsound in so far as it is not based on an impartial, objective and accurate body of evidence.

The primary focus of this report is total housing numbers (housing requirements) as given in various reports submitted to the Council in the course of the plan-making and plan-updating process.

Background

A number of Housing Requirements Studies have been produced in relation to Bradford's Local Plan. They include

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The first, by GVA, used projections based on the 2001 Census that inflated the requirement posited to such an extent that there was a unanimous vote in favour of the following motion at a meeting of the full Council on July 10th 2012:

Motion (taken from the Decision List of the Full Council):

Resolved: The Local Development Framework is critical to meeting the future needs of the Bradford District. The LDF needs to be based on the most accurate data. This Council therefore instructs the Chief Executive to obtain external confirmation as to the accuracy and applicability of data used to inform the LDF both demographic and economic and that the report should be taken to the Executive at the appropriate stage of the LDF process

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The second, (The Bradford District Housing Requirements Study February 2013) which was produced by GVA and Edge Analytics in response to the Council Motion was flawed because:

- It was not independent. GVAs involvement was contrary to the Council Motion which required **external** confirmation and verification.
- It was not timely. During the gap of seven months between voting for the motion and publication of the report it is highly likely that Elected Members would have forgotten why they had voted for the motion in the first place. They would almost certainly have forgotten its wording and the detail of the argument underpinning it.
- It did not deliver any test of accuracy (it did not audit the data). Housing Requirement was merely revisited and calculations added by the same company that had delivered the first set of figures, albeit in collaboration with Edge Analytics
- It inflated housing requirements by positing that the building of 2,210 houses in 2028 would yield 3,315 fte jobs in the housing construction industry locally and 8,840 indirect fte jobs while building 2,565 houses would generate 3,847 fte construction jobs and 10,260 indirect fte jobs (page 75)
- The assumption was that these jobs would necessitate substantial net inward migration despite the high unemployment rate of 12.7% in the District and a long standing trend of outward migration

It is worth noting here that it does not appear as though the Local Plan/LDF and/or its evidence base were ever subjected to formal Scrutiny by a relevant panel/committee of Elected Members. This appals me given the importance of the Local Plan to the future of Bradford District and the wellbeing of its citizens.

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The third, The Bradford District Housing Requirements Study Addendum Report (August 2013), also by Edge Analytics and GVA, updated housing requirements to take into account interim household projections based on the 2011 Census.

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Edge Analytics has now produced a further report: The Bradford District Housing Requirement Study Updated Demographic Analysis and Forecasts (September 2014), which takes into account more recent projections based on the 2011 Census but justifies adjusting housing requirements radically upward of them by invoking the REM/economic forecast.

It is worth noting that an additional study published by Bradford very late in the plan-making process (the Bradford District Local Plan Core Strategy Publication Draft –Viability Assessment, DTZ, December 2014) runs contrary to this. It points out that the viability of brownfield sites will remain problematic and greenbelt locations will need to be brought forward to compensate for this but bases its model of delivery on the high requirement for houses generated by GVA and Edge Analytics. It therefore assumes that economic problems will persist in Bradford District. These two things cannot simultaneously be true. Either massive job creation will occur which will lead to inward migration, increase effective demand for housing and improve the economic viability of brownfield sites or it will not occur and brownfield sites will remain difficult to develop for a long enough period to justify the diversion of development to high value greenbelt locations. The list of stakeholders consulted by DTZ consists primarily of developers, agents and planning consultants (whose clients are primarily developers). Bradford NHS Trust is the sole voice of local need in a list of twenty organisations.

Further comments/updated information

The most recent iteration of assumed future need and demand for housing in Bradford is contained in the 'Bradford Housing Requirement Study - Updated Demographic Analysis and Forecasts' produced by Edge Analytics in September 2014.

The previous study produced by Edge Analytics with GVA (The Bradford District Housing Requirements Study February 2013) was challenged on the grounds that it inflated prospective housing requirement by putting forward a specious estimate of job creation arising from housebuilding. The September 2014 report corrects this by referencing (and using) data from the June 2014 Yorkshire and Humber REM report for Bradford District a summary of which is contained in Table 1. The current study was commissioned in order to ensure that the most up-to-date ONS population statistics were used and to take into account the most recent economic assumptions (see below) and it presented a number of scenarios based on these:

- Economic activity rates from the 2011 Census
- Commuting ratio from the 2011 Census
- Unemployment rates which reflect the national economic recovery

It was also designed to consider the 2012 based SNPP as the 'official' benchmark scenario and, in general, extends the projections to 2030. Although, for reasons that are not made clear, it departs from this on Page 9 in using a projection to 2037 from the 2012 SNPP to show a rise of 14% in population (73,332 persons). This might have the effect of misleading an inattentive reader into assuming 14% growth might be expected by 2030.

In addition it up-dates the jobs-led scenario using the (then) most recent Yorkshire and Humber Employment Forecast from the Rem (the June 2014 figures)

[NB The REM summary for June 2014 displayed by Bradford MDC over-estimates economic recovery as indicated by increases in fte jobs from the pre-recession (2007) peak to June 2014 by a margin of 44,683. See table 1 for details. This is a further example of inaccuracy in data reporting that is troubling. Although it will not be focussed on here, and Edge Analytics are not responsible for the Bradford Council Summary, concern is raised as to whether it used the correct figure in its calculations. If the incorrect figure was used it would have inflated housing requirement projections and as calculations were performed by computer software it is unlikely that an error of this kind would be exposed.]

However what is most troubling in the analysis is the emphasis that appears to be placed on two particular variants of the scenarios presented (PG-10 Year and PG 5-Year A and B) which inflate international migration. Both of these include international migration estimates that are raised by Unexplained Population Change (a number of people who appeared on the 2011 census but were not reflected in some other data such as GP registrations). It adds these people and projects that UPC persons will continue to materialise in future years. This appears to be double counting. These people were revealed by the 2011 census (which is why the ONS can now identify this portion of the population) and one would therefore assume that they have been taken into account in the ONS based projections. They are clearly not illegal immigrants (illegal immigrants do not complete census forms) and it is likely that they are workers from the EU. It is recognised in the NHS in Bradford and elsewhere, that there is relatively low GP registration among EU workers because they are disproportionately young, fit and male and 'do not get round to it' until they suddenly need a doctor. I worked with and for the NHS locally and elsewhere and GPs would have loved to register them as they place few demands on NHS services but count towards income. The addition of UPC to the official ONS projections has the effect on predicted housing need as illustrated in in the table below (a similar though lesser effect occurs with the PG-5year projection (Scenarios A and B differ in that they use different assumptions re household formation rates):

Scenario	Population change by 2030	Population change %	Households change	Dwellings per annum	Jobs
PG 10 Yr (version A)	85,442	16.3%	37,279	2,041	1934
SNPP 2012 baseline (version A)	56,928	10.9%	27,980	1532	1231
PG 10 year version B	85,422	16.3%	46,824	2563	1934
SNPP 2012 baseline Version B	56,928	10.9%	37,250	2,039	1231

The inclusion of the PG 10 year and PG 5 year variants is highly dubious; particularly so given the errors in the previous report from Edge Analytics and GVA from February 2013. The various iterations of these reports on housing requirements bear all the hallmarks of evidence being manipulated to justify a predetermined plan because whatever changes to the underlying data occur (whether it's population projections or economic growth, viability or decreasing the size of sites that can be included in the SHLAA) the final figures in terms of alleged total housing requirement and distribution of housing come out virtually the same. And the requirement for circa 11,000 houses or 25% to be built on greenbelt stays the same. At the very least this is a plan devised to fit the SHLAA not a plan shaped by objectively assessed evidence and designed to meet housing need. In addition the sheer volume, complexity and inconsistency of the paperwork is indicative of something amiss. Sound strategic plans that are genuinely driven by the available evidence have no need of constant radical overhaul in terms of their underlying base and rationale. They merely require adjustment and any changes made to the underlying assumptions and evidence as they develop are clear and transparent.

This is not a plan that is driven by the evidence and it must therefore be fundamentally unsound. It is regrettable that the two most senior council officers who oversaw its formulation are no longer with the Council and are therefore not available to answer questions at the Public Examination. Tony Reeves (Chief Executive) left at Christmas 2014/15 having taken the plan through to its being submitted to the Inspectorate while Barra MacRuairie (Head of Planning and Regeneration) left at the end of March 2014 having resigned to take up a post in Bristol in December 2013.

Appendix:

Table 1 Summary of data taken from the Yorkshire and Humber Regional Economic Data for Bradford and accessed via the Bradford MDC website

REM Data June 2014	REM Data November 2014
2008 Employment fte: 173,655	Pre-recession (by implication 2007) employment fte: 176,531
<p>NB there is certainly some inaccuracy/inconsistency in the reports:</p> <p>The Bradford summary of November 2014 states that ‘the current number of FTE equivalent jobs is estimated to be 176,531 and is therefore now higher than the pre-recession employment level in Bradford.’ The REM data cited for June 2014 quotes a post-recession (2008) FTE figure which provides no basis for comparison with the pre-recession (2007) peak</p> <p>This is at odds with earlier reports based on REM. The March 2013 report for example puts the pre-recession (2007) employment rate at 221,214 fte. The March 2013 figures are consistent with summaries and assumptions from other sources regarding the estimated time and economic growth required to get back to pre-recession employment rates. Therefore it is likely that the REM Data November 2014 figure quoted above is wrong.</p>	
Estimated employment growth to 2024	Estimated employment growth to 2015
16,470 fte (9.5%)	13,300 fte (7.5%)
GVA growth to 2024	GVA growth to 2025
Total in 2024: £2.1 billion	Total in 2025: £1.9 billion
Growth over ten years: 28.3%	Growth over ten years: 25.2%
Total GVA: £9.6 billion in 2025	Total GVA: £9.6 billion in 2025
<p>NB the figures quoted for November 2014 indicate higher growth in GVA within Bradford District than the Yorkshire and Humber average (24.2%) but a lower growth than the UK average (27.4%).</p> <p>It also does not acknowledge that GVA in Bradford is currently low compared with both the Yorkshire and Humber average and the national average (England) and therefore has considerable room for growth.</p> <p>The November 2014 REM summary puts productivity in Bradford at £43,400 per fte worker which is significantly lower than the Yorkshire and Humber regional average of £46,500 and substantially lower than the UK average of £55,100 per fte.</p>	