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Local Plan for the Bradford District

Core Strategy

Background Paper: 3. Economy and Jobs

February 2014

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1.0 INTRODUCTION

1.1 This document is a supplement to the Core Strategy Publication Draft, providing the background information that has informed the policies within the 'Economy and Jobs' section of the Plan. It outlines the various factors considered in setting out the Council's approach to planning for a supply of employment land for the District and the evolution of the policy formulation to publication stage. It examines the local and strategic context of Bradford, its position within the Leeds City Region and explains the purpose and justification in developing policy. It also encompasses the most recent guidance on plan making as set out by the National Planning Policy Framework, March 2012. It draws from and summarises the main findings of the evidence studies which relate to the economic conditions of the District, studies which were undertaken in preparation of the development plan process. Furthermore, it discusses the amount and type of employment land currently available in the District. It establishes the future requirement for employment land up to 2030, proposing a spatial strategy for the location of new employment opportunities and the distribution of sites across the District.

2.0 THE DEVELOPMENT AND EVOLUTION OF THE CORE STRATEGY ECONOMY POLICIES

2.1 Key Issues and Options Stage

- 2.1.1 The Core Strategy has continually evolved as it progressed from the Issues and Options Stage through the Preferred Options to the Further Engagement Draft and then the Publication Draft. There has been an ongoing consultation with the public, Statutory Consultees, Government organisations and Key Stakeholders. It is this consultation, revised government guidance and updated evidence that has refined the policies to what is now presented in the Publication Draft.
- 2.1.2 The principal documents setting the background for the early work on the Local Plan included:
 - Updated Bradford Vision 2020 Bradford District Community Strategy 2006-09 (March 2006)
 - Bradford District Sustainable Community Strategy 2007-10
 - Draft Regional Spatial Strategy for Yorkshire and the Humber (consultation January – April 2006, Examination September-October 2006)
 - Draft Regional Spatial Strategy for Yorkshire and the Humber (Panel report July 2007 Proposed Modifications September 2007)
 - Leeds City Region Development Plan (November 2006)
 - Developing a robust evidence base (Urban Potential Study/employment land study /Local Housing Assessment/Retail Assessment)

From these documents a number of topic papers were published setting out the main issues for consideration and the commencement of engagement with stakeholders and the public.

- 2.1.3 The Issues and Options consultation process in 2007 highlighted the key factors facing the Economy of the District which should be addressed through the planning process. (See Statement of Consultation Issues and Options Topic Paper 4, February 2007 which provides a summary of the comments and the Councils response.) The Paper identifies 6 principal issues with options for consideration, as follows:
 - (i) Economic Trends
 - (ii) Employment land Supply and Forecasts
 - (iii) Location of Employment Activities
 - (iv) Protecting Existing Employment Land and Buildings
 - (vi) Definition of Employment Uses
 - (vii) Rural Diversification
- 2.1.4 In response to these issues, the options supported through representations were:
 - Providing less land, but in the right locations would be beneficial to the district. Little support was given to the provision of more land and providing better quality sites.
 - The LDF should ensure there is the right amount of land by basing land allocations on statistical employment forecasts such Experian & statistical employment forecasts, with support also for a more pragmatic led approach. However it was commented that there needs to be an element of flexibility to allow for changes in industry, commerce and other economic development

- There were mixed views to the potential locations for employment, with respondents favouring all options equally. Some suggested that the release of employment sites should be strategically controlled to ensure development is targeted at areas such as Bradford City Centre, the main urban area, and those areas identified as regeneration priorities. This would apply to the smaller towns and villages where there is a need for employment opportunities to maintain vitality and so not to become dormitory settlements for the larger towns. However, others suggested that a flexible approach should be taken in terms of allocating employment sites, and businesses should be able to locate where they want, where possible. Such sites should also be informed by a sequential test and the Strategic Flood Risk Assessment (SFRA) and should not be located where it may affect recognised wildlife sites.
- The majority of respondents favoured protection of sites in certain locationally suitable areas and those sites in the exiting employment zones. Further comments suggested employment sites should be de-allocated in some circumstances if the sites are not longer viable or if there has been no interest over the Plan period.
- The majority of respondents supported the option that the definition should be widened to include other employment generating activities. The definition of employment should recognise the importance of local employment, such as shops and pubs especially in small settlements and be sufficient flexibility to allow for diversification in the rural economy.
- Respondents stated that the Core Strategy should place a greater focus on supporting sustainable approaches to farming, tourism and land management, including the re-use and redevelopment of farm buildings to assist local businesses and the economy in order to secure the long term future of the district's rural areas. Further comments encourage the development of small incubator and live/work units to encourage the development of small and medium enterprises; and an approach to allow for the extension or erection of new agricultural buildings where there is a proven need.
- 2.1.5 A consultation document entitled 'Further Issues and Options' was published in February 2008. It highlighted recent changes that had taken place at National, Regional and Local level that would impact on the preparation of the Core Strategy. It also set out a spatial vision for the District, identified themed strategic objectives for the District including the economy and jobs, and also considered broad options for the location of major development. The document looked at a potential settlement hierarchy with a range of growth points across the District. It made reference to the publication of the Regional Spatial Strategy (RSS) and its broad implications for the District. It identified a number of studies and were underway or due to commence. Those that would have economic implications were the Employment Land Review and the Retail Study.
- 2.1.6 Notable factors presented in the RSS and impacting on the District's economy included the identification of Bradford as a Regional City, the economic importance of Bradford City Centre and the Principal Towns of Ilkley and Keighley. The RSS also set targets for the amount of employment land that should be located in Bradford District and recognised Airedale as an important regeneration area.

- 2.1.7 The response specific to the 'Further Issues and Options' was extremely limited with most of the commentary related to Wharfedale. The main points were:
 - The distribution of employment land growth in the district needs to be fully and effectively considered in the context of the above assessment. There is a need for a balanced and flexible approach to the provision of employment land in Ilkley to serve both the town itself and the surrounding catchment area. The Allocation Development Plan Document must ensure the provision of a new business park for Ilkley and sites will be put forward for allocation as part of the consultation process on that document. There is a need for retail, office and industrial, and SME's.
 - Location of employment should be related to housing provision to reduce commuting trips
 - Bradford City Centre should be a focus for significant employment growth, particularly office development
 - Support for Economic growth across the District as it helps drive the subregional economy
 - Support for increased employment opportunities in Airedale
- 2.1.8 Policy was therefore derived from the principle Strategic Documents listed in Paragraph 2.1.2 above. Whilst the Regional Spatial Strategy and the Regional and Local Economic Strategies provided the basis for the economic strategy of the Plan, the local Bradford dimension was based on the Employment Land Review which was completed between 2007 and 2010. This study contained an assessment of the current supply of employment land in the District, estimated potential demand based on the 2007 Regional Econometric Model (REM) and local market analyses and set a broad strategy for planned economic development in the District.
- 2.1.9 The Economic Recession of 2008/2009 produced large variations in the projections of the REM and this had major implications on the estimated demand for employment land and its location across the District. A refresh of the Employment Land review was undertaken in 2011 producing a revised figure for the employment land requirement and an overview of the local economic and market performance of the District. This assisted with the formulation of Policy in the Preferred Options Stage of the Core Strategy Further Engagement Draft, published in October 2011 for public consultation.

2.2 Preferred Options Stage - Further Engagement Draft

- 2.2.1 The Core Strategy Further Engagement Draft set out the proposed approach to planning for Economy and Jobs up to 2028. Following public consultation, a number of representations relating to the policies and were submitted to and considered by the Council and these can be found in the Further Engagement Draft documents.
- 2.2.2 The draft NPPF was published in July 2011 for consultation, with a presumption in favour of sustainable development. Economic development was the principle

thread running through the document, emphasising the need for effective planning for business development. The emerging policy was published too late to effectively effect any changes to the Core Strategy Further Engagement Draft. However, it was a consideration in addressing representations at the next stage of the Plan.

2.3 Publication Draft Policies

- 2.3.1 After the Further Engagement Draft stage, some changes were made to the specific policies as a result of changes to economic circumstances, Local decision making, submitted representations and updated evidence. Policy EC1 is largely retained in its original format. Reference has now been made to ICT high speed communications installation. A further subsection has been included to provide additional support for rural diversification and sustainability of agricultural and rural businesses.
- 2.3.2 In the Publication Draft, Policy EC2 remains largely the same in structure and the changes are only found in the detailed figures and quantities. The increase in annual jobs provision has been increased due to increases in the ONS projections and NOMIS figures. The change in the supply of developable employment land is based on annual monitoring figures and their projection rather than the Regional Econometric Modelling process. This is discussed in Section 6. The policy also gives further support to ensuring the viability of centres.
- 2.3.3 In the Publication Draft, Policy EC3 has been restructured slightly, clarifying the amount of employment land that will be distributed across the District, the sources from which it will be met and the potential non urban or green belt locations where strategic employment sites may be identified. There is a total reduction in the total requirement which is now based on development trends. A reduction in the amount of employment land proposed for Wharfedale is due to the implications of the Habitat Regulations Assessment and its impact on housing and population growth in this part of the District.
- 2.3.4 Policy EC4 remains largely the same as the Further Engagement Draft. Additional support is given to the extension of high speed broadband to rural communities in sub section G. There is also a change in sub section I to reflect updating of the recognised 'BREEAM' standards.

3.0 THE CONTEXT FOR GROWTH

3.1 Bradford District in Context

3.1.1 Bradford District, with a population of 524,600 (ONS 2012 mid-year estimate), is the 5th largest metropolitan district in the UK. The population is rapidly changing and with a future estimated growth rate of 8.5%, is growing at a higher rate of increase than the national average. A substantial increase in the number of households is predicted over the plan period and it is estimated that around 42,000 additional new homes will be required across the District to accommodate this growth. It is essential that economic development keeps pace with this expansion. Figures from the 'Understanding Bradford District Report, September 2013' show that the District has a young population structure, with a large proportion of the total population being made up of people in the lowest age groups. The Under 16 year olds account for 23.5% of the total population, the highest proportion in the Leeds City Region and this makes Bradford the youngest major city in Great Britain. Over the next ten years the number of 16 year olds is predicted to increase by 13,200 - an increase of 10.75%. This young and growing workforce will be essential to filling the jobs created in both the District and in the Leeds City Region and it has the potential to provide the skilled workforce needed to power and drive forward the Districts economy. The long term ambitions for regeneration in the Community Strategy is that by 2020, Bradford's economy will be a driving force in the Leeds City Region, a place in which business thrives, creating opportunity prosperity and jobs. The latest population and household projections provide an opportunity and a range of challenges - the opportunity that a growing labour force will stimulate economic growth; a challenge in that employment growth and regeneration keeps pace with housing provision, and supported by a well connected transport and infrastructure system to ensure a sustainable Bradford District.

3.2 Bradford's Local Economy

3.2.1 Following the recession in 2008, Bradford experienced significant falls in business numbers and employment. There are now signs of improvement and between 2011 and 2012 the numbers of businesses in the District increased by 370. Today Bradford has the second largest economy of all the districts in West Yorkshire. The 'Understanding Bradford District Report, September 2013' estimates that the District's GVA is worth about £8.3 billion and contains 20.4% of all businesses in West Yorkshire. The District has around fifteen thousand businesses which provide almost 192,200 jobs, accounting for 15% of the total employment in the Leeds City Region. Bradford has a powerful culture of entrepreneurship. Approximately 29,200 people in the District are self-employed and the level of business start ups has been strong during 2012. The District is home to a number of large businesses with recognised brands operating on a national and international scale such as Wm Morrison, Yorkshire Building Society, Santander, Hallmark Cards, Pace, BorgWarner, Provident Financial and more recently, Marks and Spencer. It is also home to nationally outstanding cultural businesses, a strong group of new media companies, and a significant national institution in the National Media Museum. The creative and cultural industries provide a distinctive competitive edge regionally and the visitor economy has grown, year on year. Bradford has a notably higher proportion of employees in manufacturing, education and health compared to England averages. Employment in construction, accommodation and food services, professional services, business services and arts and recreation is lower than England as a whole. The low representation of high value knowledge based

industries such as professional and business services is a weakness in the local economy and addressing this is key to moving the District toward a higher value, higher wage economy.

3.3 Economic Challenges

Despite these promising indicators, the District's growing population will need 3.3.1 more jobs and more housing. Unemployment, worklessness and economic inactivity are increasing. Women, people from black and ethnic minority communities, lone parents, people over 50, and people with disabilities or low qualifications are less likely to be employed. Skills levels fall short of regional and national averages, and the proportion of people with no qualifications is too high. Reliance on benefits is particularly high in deprived areas. The District remains a low pay area reflecting weak private sector jobs growth and too few high value knowledge businesses. Bradford City Centre needs revitalising. Growth in the visitor economy is dependent on regeneration which will provide a better shopping experience, more hotel accommodation; and on improving the guality and accessibility of the District's attractions. The District faces gaps in both the capacity and quality of its transport network which needs to be addressed to connect people with jobs across the District and the Region. This challenge is made greater by the need to provide for an expanding population at a time when the economy is recovering from recession. Only a modest level of economic growth is anticipated over the next few years, with reduced levels of public expenditure to fund public sector intervention. The Plan has a key role to play in laying the foundations for future growth over a 15 year timescale which should encompass the upward trending part of the economic cycle. Its key aims are regeneration and job creation as derived from strategic policy both regional and local.

4.0 NATIONAL, STRATEGIC AND LOCAL POLICY GUIDANCE

4.1 National Planning Policy

4.1.1 The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meet the twin challenges of global competition and of a low carbon future. This is set out in current policy guidance. The National Planning Policy Framework (NPPF), published in March 2012, recognises that the purpose of planning is to achieve sustainable development through economic, social and environmental dimensions. The economic role in this respect is in contributing to building a strong, responsive and competitive economy; by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure. The guidance establishes a set of core land-use planning principles to underpin both plan making and decision making. With regard to the District's local economy, it states that planning should proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs. Plans should set out a clear strategy for allocating sufficient land which is suitable for development, taking account of the needs of the business communities.

4.1.2 (I) Building a strong competitive economy

The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should encourage sustainable growth and to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of the 21st century. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up local plans, local planning authorities should:

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

4.1.3 (II) Ensuring the vitality of town centres

The guidance also states that planning policies should promote competitive town centre environments and should set out policies for the management and growth of centres over the plan period. In rural areas, policies should support economic growth in order to create jobs and prosperity by taking a positive approach to sustainable new development.

4.1.4 (III) Rural areas

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings
- Promote the development and diversification of agricultural and other land based rural businesses
- Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres
- Promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship

4.1.5 (IV) Business

Local Planning authorities should set out the strategic priorities to deliver the provision of retail, leisure and other commercial development. In doing so they should maintain a robust evidence base to understand both existing business needs and likely changes in the market. They should use this evidence to assess the needs for land or floor space for economic development, including both quantitative and qualitative needs for all foreseeable types of economic activity over the plan period and the existing and future supply and its sufficiency and suitability to meet identified needs.

4.2 Regional / Strategic Framework

4.2.1 At the Yorkshire and Humber level several key strategies informed the economic section of the earlier versions of the Core Strategy, particularly the Regional Spatial Strategy (RSS) and the Regional Economic Strategy. Coordinated working on strategic matters is now undertaken at the City Region level through the Leeds City Region Partnership. The Government created Local Enterprise Partnerships (LEP) as part of their approach to regeneration and economic develop following the abolition of Regional Development Agencies. Their primary function is to help rebalance local economies and stimulate private sector growth. Local Enterprise Partnerships are based on functional economic areas, facilitating alignment, and a more efficient use of resources. The Leeds City Region LEP provides a strategic role in setting priorities that stimulate investment and increase private sector employment. The Partnership have been working

together to look at how policy and delivery at this broad area level can be changed to improve economic growth and competitiveness. The 'Leaders Board' provides the accountable decision making structure and in 2011 published the Leeds City Region Interim Strategy Statement as a basis for future development strategies including a strategic policy of urban renewal to support growth and regeneration ambitions in the Leeds Bradford Corridor. The Leeds City Region established its business-led board, the Local Enterprise Partnership Board, to work alongside the Leaders Board in order to effectively address the City Region's economic challenges. The Leeds City Region Local Enterprise Partnership Plan was published in April 2012 and is a five-year strategic plan incorporating 4 strategic priorities. These are:

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

4.3 The Bradford District Economic Strategy 2011-2013

- 4.3.1 The Bradford District Economic Strategy was drawn up jointly between the Council, and Bradford Regeneration and Prosperity Partnership with substantial input from the private sector. It draws on the latest evidence and analysis from the Bradford District Economic Assessment to identify priorities for action. The Strategy is focused on transition from recession to recovery and has three principal interlinked and transformational goals.
 - (i) Promoting sustainable and resilient economic growth by increasing the number of successful businesses and raising levels of activity and trade.
 - (ii) Increasing the number of quality long term jobs for a growing workforce
 - (iii) Raising the economic well being of local residents.
- 4.3.2 There are two priorities for action. 'Building entrepreneurship and innovation' is centred around the provision of new skills, improving the business environment and building on sector strengths to create new assets and specialisms. 'Working from the centre outwards' is focused on a quality physical environment for the City, improving its retail and commercial offer and developing a new central business district. The Economic Strategy seeks to maintain momentum in significant functional economic areas, working with partners to develop the Canal Road Corridor and delivery of the Airedale Masterplan. The District's Economic Strategy is supported by The Community Strategy which has a strong economic focus; and by the Employment and Skills Strategy. It is these principles which underpin the economy policies of the Core Strategy and conform to the NPPF

recommendations which are to set out a clear economic vision and strategy for the District.

4.4 Bradford – the Producer City; A Strategy for Business and Economic Growth in Bradford District

- The Council's 'Producer City Strategy', approved in January 2014 has been 4.4.1 created in partnership following a major consultation exercise that has involved over 100 individual conversations with businesses across the District. The Strategy provides the framework for engaging with business and partners to bring together resources, knowledge and activity to support business and economic growth in Bradford. It provides an opportunity to work collaboratively with other like minded cities, institutions and organisations beyond Bradford. The 'Producer City Strategy sets out an economic ambition for Bradford District and outlines the actions taken to build a strong and sustainable local economy. The strategy is built on a unique and differentiated economic identity and purpose for Bradford and identifies priorities that will drive action to support business and economic growth in Bradford. The Producer City describes an economy in which businesses create innovative goods and services, make them competitive and trade them globally. It is predicated on analysis that has revealed real strengths in key industries and businesses across the whole District. Bradford has a proud industrial heritage built by entrepreneurs and innovators who have married new ideas and technologies to the energy and skills of successive generations of people who have made the District their home. The District has great assets to draw upon. It boasts a big economy with globally successful businesses, a diverse and enterprising population, strong knowledge institutions, a world class cultural offer, attractive urban and rural environments, a tradition of private and public partnership and increasing momentum provided by the regeneration of the city centre. The challenge is to build upon these revealed strengths to address acknowledged weaknesses. This will be accomplished by:
 - <u>Creating the conditions for business</u> to make Bradford the best place to set up, grow and run a business.
 - <u>Making Knowledge Work</u> putting innovation, knowledge creation and higher skills at the heart of the economy.
 - <u>Trading on Bradford's culture of enterprise</u> building on Bradford's strengths to compete in the global economy
- 4.4.2 The next decade is a crucial period for the Bradford economy. Bradford is one of the biggest and fastest growing cities in the UK and is a key part of the Leeds City Region. Business success is essential to the future economic and social wellbeing of the city and the District and it will generate the wealth and the jobs needed for its residents.

4.5 New Government Initiatives and strategies for Economic Growth

4.5.1 (i) The Regional Growth Fund

The Regional Growth Fund (RGF) is a £3.2 billion fund operating across England from 2011 to 2017 to stimulate local enterprise. It supports projects and programmes that lever private sector investment to create economic growth and sustainable private sector employment. It also supports communities currently dependant on public sector jobs to make the transition to private sector led growth. Since being established the Local Enterprise Partnership has supported City Region applications to the Government's Regional Growth Fund. As a LEP

board member Bradford has an active role to play in shaping city region priorities and securing investment both for the District and the wider City Region.

- 4.5.2 Bradford has been successful in securing £17.6m of Regional Growth Fund for the 'Bradford City Centre Business Growth Scheme'. Building on the positive impact of the new City Park, this is a welcome investment that will support new and existing businesses within the City Centre. It offers a business rate rebate to eligible businesses that are creating new jobs inside the zone. The scheme in certain circumstances, also offers grants for improvements to premises, provision of machinery and equipment, access to employment and skills support, new IT infrastructure and relocation of operations.
- 4.5.3 The Westfield retail development scheme forms a key part of the City Centre Growth Zone. Construction has now commenced and this will help boost confidence in the City Centre.

4.5.4 (ii) Superconnected Cities

Businesses in Bradford will benefit from a share in the £100m 'Superconnected Cities' programme designed to help boost productivity. Funding assistance will be available to cover the installation costs of upgrading to a superfast or business grade broadband connection. It is open to all small and medium sized enterprises. The programme will drive growth, attract new businesses and transform the way services are provided and assessed.

4.5.5 (iii) Assisted Area Status

Assisted Area status permits the granting of additional financial support to small businesses and large enterprise in less economically advantaged locations. This support is to encourage business within the areas to grow, innovate and thrive. These locations are recognised as areas which have potential for business growth and that there are robust partnerships or clusters in place to drive economic regeneration. The government is conducting a review of the current extent of the coverage of Assisted Areas with the objective of bringing a revised map into use in July 2014. Bradford currently has no wards within the Governments Assisted Area map. However, following a Stage 1 consultation, which was coordinated through Leeds City Region, 5 wards within the District, centred on the south east quadrant of the city and including the city centre, have been proposed for inclusion in the revised map and this is now out for consultation.

5.0 THE ECONOMIC EVIDENCE BASE

5.1 The Regional Econometric Model (REM)

- 5.1.1 The Regional Econometric Model (REM) run by Experian Business Strategies in association with the Regional Economic Intelligence Unit, undertakes economic estimates and forecasts for the UK as a whole, for local authority districts within the region as well as the Leeds City Region (LCR) and Sheffield City Region. It provides data on:
 - Output (£m and GVA (£m)
 - Employment Full Time Equivalents (FTE's), part time, self employment, employees
 - Population and migration statistics
 - Occupations and skills
- 5.1.2 It builds up a complex picture of market growth and demand and determines how the whole system reacts to changes. It can base economic outcomes and projections on a large range of employment sectors, variables and multipliers which are built into the modelling matrix. For example it measures the supply chain linkages based on demand for goods, regional outputs, employment statistics, wage levels, supply of labour, technology shifts, population changes, household projections, local markets, etc and how they interrelate, thus providing estimates of projected jobs growth across the various job sectors. Key metrics include employment and output by 38 Standard Industrial Classification (2007) sectors at local area level out to 2031. Household incomes and expenditures, population projections and unemployment rates are amongst the variables available for all local areas in the UK. Focusing on the results from the March 2013 REM forecast, the local economic picture can be summarized as follows:

5.1.3 (i) National and regional picture

- The UK employment rate is now 71.6% up 0.2 percentage points from the previous quarter.
- Unemployment has continued to fall. For the period May to July 2013 unemployment was 7.7%, down 0.4 percentage points from a year earlier.
- There is more part-time working in the labour market (1.45 million the highest since records began in 1992) and also more under-employment with people working fewer hours than they would like to.
- There remains little pressure for wages to rise but there is still pressure on consumers as inflation has remained broadly steady since spring 2012. Inflation is expected to continue to outpace increases in wages.
- Yorkshire and the Humber's rate of GDP (Gross Domestic Product) growth and employment growth will be lower than the UK average over both the medium term 2013-17 and the longer term to 2020.
- Within the Leeds City Region, growth in output is forecast to outpace that of Yorkshire & Humber as a whole.

Within the City Region, manufacturing output is not forecast to grow strongly

 compared to growth in administration and support service activities,
 professional services, finance and retail and health. However, there are some
 niche markets within manufacturing that are expected to grow.

5.1.4 (ii) Bradford picture

- Growth in employment and GVA (Gross Value Added) in Bradford District has been revised upwards in the March forecasts from the REM – as is the case for other districts in LCR.
- Bradford District's forecast growth in total employment (both employees and self employed) at 7.5% between 2013 and 2020 is anticipated to outstrip that of the Y&H region (+5.0%) and UK (+6.5%).
- Over the same term, GVA is forecast to grow by 16.9% in Bradford faster than the forecast rate of growth for Y&H region (+15.5%) and most other districts in LCR.
- Bradford and Leeds districts are expected to account for around 56% of GVA growth in LCR between 2013 and 2020 and as such the two districts will dominate growth in the LCR economy.
- Although the rate of growth in Bradford District's economy is expected to be relatively strong, the depth of the recession has been such that pre-recession levels of employment will not be reached in the District until around 2018.

Use of the REM

5.1.5 The REM has been used to provide an up to date picture of economic and market performance in the District, contributing directly to the Local Economic Assessment and the Employment Land Review, key evidence resources for the Core Strategy which are discussed later in this section. The most recent run of the model for the Council was undertaken in March 2013. This predicted a growth in jobs (FTE - Full Time Equivalents) of 27,000 in all of the business sectors between 2013 and 2030, the life of the plan. Using the forecast for jobs growth in the B class uses, an indication of the future land requirement can be determined in principle although, as explained in Section 6.3.3 below, the model is not used in the Local Plan.

5.2 Understanding Bradford District Report (September 2013)

5.2.1 The 'Understanding Bradford District' report provides a comprehensive analysis of Bradford District bringing together a range of evidence and intelligence from a variety of sources. It builds on the former 'Bradford District Local Economic Assessment' and highlights the key drivers that shape the current position of the District and its future opportunities and challenges. It is designed to inform work on prioritisation as well as providing accurate and reliable analysis to the District's stakeholders. It provides a broad understanding of the local economy and the economic, social and environmental factors that impact on economic growth in Bradford District. Combined with the earlier Local Economic Assessment there are a number of key messages against which a strategy is evolved to plan for the future provision of jobs and economic growth. These are:

- A refresh of the Local Economic Assessment conducted in January 2013 concluded that the District economy is still bearing the impact of the recession. Recovery remains fragile with weak jobs growth and a growing proportion of the workforce not in employment.
- The latest market data shows that Bradford District has seen some positive improvements in the local labour market to 2012. Economic and employment rates have recently increased while unemployment and economic inactivity have fallen. Despite this, Bradford District has the highest worklessness rates of any district in the Leeds City Region.
- Youth unemployment is a significant issue in Bradford with levels continuing to rise and deprived areas continuing to experience levels far higher than the District average. It is particularly high among young women.
- Educational attainment is improving but Bradford has a low skilled legacy. Having low or no qualifications proves to be a significant barrier to employment. The proportion of adults with the minimum number of qualifications deemed necessary for employment remains far lower than the national average. Around two thirds of people in Bradford with no qualifications do not have a job.
- GVA per head in Bradford District is lower than regional and national averages. The District's productivity lags behind national rates, largely due to a shift in industrial structure (a declining industrial base and an increase in public services), a lower than average proportion of jobs in high value knowledge industries such as financial services and lower than average job density
- Local enterprise remains strong. Bradford District has a powerful culture of entrepreneurship which is a distinctive asset. However, the growth in self employment has not been strong enough to offset the loss in resident employee jobs over the past 5 years.
- The manufacturing sector is important to the District's economy in terms of output and employment, accounting for 22% of the District's GVA and 13% of the District's employees. Manufacturing employment in Bradford District has remained steady in the recession and following years and latest forecasts in the Regional Econometric Model show that the sector should perform well in the short term.
- The service sector is the largest part of the District's economy, accounting for 82% of all employees. Bradford District is highly dependant on public sector employment and ongoing spending cuts will impact on future supply. Retailing saw a large reduction in jobs since the recession years. However, economic forecasts predict a general growth in service sector jobs in general, with a significant increase through self employment.
- Bradford City Centre retains significant economic impact and potential and is the key economic driver for the District. Its success is pivotal to the prosperity of the wider district and the Leeds City Region. The City Centre remains the key location for employment in the District, particularly office based employment. Approximately 17% of the District's jobs are based there.

However, the City Centre has experienced job losses in retailing, catering, financial and business services over recent years.

- Bradford District is constrained by a lack of quality premises and employment sites. Much of the office stock is outdated, there is a lack of variety of employment sites with a predominance of small sites under 5 hectares and invariably with development constraints.
- Bradford District is well placed to take advantage of emerging industries involved in the 'green' economy. The manufacturing sector should benefit from planned investments in renewal and low carbon energy projects and be able to move into advanced manufacturing within the green economy. The District's environment is a natural asset. Its rural areas not only support agriculture but also a growing number of enterprises and home based working.
- 5.2.2 It is these broad indicators which help define the scope of the policy framework in the Core Strategy which can address shortfalls in the local economy, its performance and opportunities to achieve sustainable economic development across the District.

5.3 Employment Land Review

- 5.3.1 Past Government guidance advised that the economic aspects of the Council's Local Plan (formerly Local Development Framework), and the formulation of Policy should be informed by the production of an Employment Land Review and by the information and analysis contained in the Council's Local Economic Assessment which was first published in 2011.
- 5.3.2 In February 2007, the Council commissioned consultants ARUP with the preparation of an 'Employment Land Review' (ELR) for the District and this was completed in December 2007. Whilst employment covers a wide range of sectors (retail, health and medical, education, financial and business services, hotel and catering, construction etc) the focus of the review and this paper relates to the employment floor space and land provision needs of the group of 'B' Class sectors as defined in the General Development Order. These are:
 - B1 Business (B1a offices, B1b research and development, B1c light industry);
 - B2 General Industrial; and
 - B8 Storage and Distribution (wholesale warehouses, distribution centres)
- 5.3.3 The Employment Land Review forms one of the key technical studies included in the evidence base for the Core Strategy and is available on the Council's website. It comprises a number of elements:
 - An overview of the economic structure of the District
 - An assessment of the employment land supply in the District. All of the sites in the Council's existing land supply portfolio were appraised qualitatively against a range of criteria to assess their suitability for future employment use, focusing on attractiveness to the market. Sites were also categorised according to whether they were considered deliverable in the short, medium or longer term. The majority of the sites in the current supply were considered to be developable at some point in the plan period and worthy of

retention subject to the overall scale of need and spatial strategy to be adopted. Details of the supply are set out below at Section 5.4.

- An assessment of the projected demand for employment over the plan period comparing several different projection methodologies; The approach recommended in the report was to derive a range of employment land need based on two different runs of the Experian Regional Econometrics Model. The model produces jobs growth projections across the different employment sectors which can then be converted to land requirements. It incorporated both constrained and unconstrained growth scenarios, defined by the level of economic growth anticipated together with the implementation of local regeneration projects and initiatives. The models forecast in 2007, a requirement of between 214 (Unconstrained growth) hectares and 148 (constrained growth) hectares of employment land. This comprises: B1a = 40-30 ha; B1 b and c / B2 = 100 to 68 ha; B8 = 74 to 50 ha.
- The review also undertook an assessment of market and property trends and data;
- A comparison of the supply of employment land against the likely market demand and property trends, assessing location and size in terms of the potential B Class Uses;
- 5.3.4 A total of 123 hectares of land, incorporating the available allocated sites in the RUDP, were subjected to a qualitative assessment in the Employment Land Review. They were analysed on their suitability and attractiveness based on accessibility, market strength and site constraints. They were also appraised on whether the sites were likely to be available or come forward in the short medium or longer term. The review concluded that 68.9 hectares (56%) would be available in the short term; 30.4 ha (24%) in the medium term and 24 ha (19%) in the long term.

5.4 Current Supply of Employment Land

As of 1st April 2013, 107.68 hectares of employment land remained undeveloped 5.4.1 from the existing employment sites allocated within the Replacement Unitary Development Plan of 2005. This supply of land is made up of a total of 49 sites of varying sizes, located across the District. 25 sites are less than 1 hectare in size, 18 are between 1 and 5 hectares and 6 sites are greater than 5 hectares. In Bradford North there are 15.78 hectares of employment land comprising of 7 sites, two of which are on the edge of the urban area. The remainder are concentrated in the inner urban areas. Bradford South provides 16 allocated sites amounting to 39.01 hectares. However, only two sites in this constituency are above 5 hectares in size although the M606 corridor to the south of the city provides a stimulus for future inward investment. In Bradford West 4 sites provide 10.51 hectares, Keighley 21.98 hectares on 13 sites and in Shipley, 9 sites provide 20.4 hectares. The current supply can be generally characterised as small sites to accommodate new local demand, mainly as infill opportunities or expansion land for existing employers. There are only a few sites which can be considered as strategically important. The nature of this supply presents a challenge in bringing it all forward for immediate availability to meet modern business demands. The Allocations Development Plan Document will reappraise this current land supply with an evaluation of the suitability and deliverability of the undeveloped sites. It will include an assessment of any new site options

which would be better placed to serve the needs of the relevant sectors of the economy.

Potential Additional Employment Land

5.4.2 The Council's employment land register also contains a number of unallocated employment sites which have planning backing through the granting of planning permission for 'B' Class business uses. There are 8 sites in total providing a further 7.08 hectares of potential employment land. Most of these sites are relatively small. 5 are less than 1 hectare in area, 2 are just above 1 hectare and only one, at Queensbury in Bradford South, is 5.15 hectares. In Bradford North, 4 sites provide 3.46 hectares; in Bradford South 2 sites provide 1.73 hectares and in Bradford West, 2 sites provide 1.89 hectares. There are currently no unallocated sites in Keighley or Shipley with established planning backing. Across the District there is therefore the potential for 114.76 hectares of land in total that can be brought forward for development for employment purposes.

Table 5.1 Employment Land Supply 2013

Total available land	in the District:	114.76 ha	
Total allocated land	in the District:	107.68 ha	
Total unallocated la	nd in the District:	7.08 ha	
Total Land available in:			
Bradford North	11 sites	19.24 ha	
Bradford South	18 sites	40.74 ha	
Bradford West	6 sites	12.40 ha	
Keighley	13 sites	21.98 ha	
Shipley	9 sites	20.40 ha	
Total:	57 sites	114.76 ha	

Total Allocated land available in:			
Bradford North	7 sites	15.78 ha	
Bradford South	16 sites	40.74 ha	
Bradford West	4 sites	12.40 ha	
Keighley	13 sites	21.98 ha	
Shipley	9 sites	20.40 ha	
Total:	49 sites	107.68 ha	

Total Unallocated land available in:			
Bradford North	4 sites	3.46 ha	
Bradford South	2 sites	1.73 ha	
Bradford West	2 sites	1.89 ha	
Keighley	0 sites	0 ha	
Shipley	0 sites	0 ha	
Total:	8 sites	7.08 ha	

Table 5.2Employment Land Supply (Hectares) at 1 April 2013
(Sites Allocated in RUDP)

	Total Area	Number of Sites	Sites< 1ha	Sites > 1ha	Sites > 5ha
Bradford North	15.78	7	4	2	1
Bradford South	39.01	16	8	6	2
Bradford West	10.51	4	1	2	1
Keighley	21.98	13	7	5	1
Shipley	20.40	9	5	3	1
Total	107.68	49	25	18	6

Table 5.3	Windfall Employment Land (Hectares) at 1 April 2013
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	Total Area	Number of Sites	Sites< 1ha	Sites > 1ha	Sites > 5ha
Bradford North	3.46	4	3	1	0
Bradford South	1.73	2	1	1	0
Bradford West	1.89	2	1	1	0
Keighley	0	0	0	0	0
Shipley	0	0	0	0	0
Total	7.08	8	5	3	0

5.5 Setting a Policy for Sustainable Economic Growth (EC1)

5.5.1 Although conditions are in a weaker position since pre-recession years, economic policy at the Leeds City Region level identifies Bradford District as a centre for new enterprise and opportunity and recognises the competitive opportunities the District can bring in driving forward the regional economy. The Councils Economic Strategy supports a vision of transformational change for Bradford District, with economic growth and job creation anticipated in the business, professional and financial, manufacturing, construction, retail and service sectors. Emerging sectors such as design and technology, and health will also contribute to the District's changing economy with growth in priority clusters such as the digital and media sector in Airedale. At the District level the Economic Strategy recognises the need to adapt and identify new ways to support business growth and improve prosperity. At the root level this includes training, business support and embedding entrepreneurship. At the wider level the strategy aims for ongoing inward investment, initiating new major regeneration schemes, and building the appropriate infrastructure across the District to help deliver the

economic recovery. To support this endeavour, the Core Strategy, initially through Strategic Core Policy SC1 and in the Economy and Jobs Section through Policy EC1, sets a broad objective of creating a successful and competitive Bradford District economy within the Leeds City Region.

6.0 THE DEMAND FOR JOBS AND EMPLOYMENT LAND

6.1 Worklessness and Demand for Jobs in the District

6.1.1 The working age population (16-64) in Bradford District accounts for approximately 62.2% of the population total. The District's Local Economic Assessment estimates that more than 1 in 3 people of working age in Bradford are currently out of work, numbering 123,900, which is a rate of 37.8%. Worklessness rates and benefit claimant rates remain above regional and national levels. The DWP figures for February 2013 show that 15.2% of 16-64 vear olds are claiming one or more out of work benefits compared to 13.1% for Yorkshire and Humber and 12.3% for Great Britain. Those registered on 'Job Seekers Allowance' account for 5.9% of the working population, compared to 4.4% for Yorkshire and Humber with male claimants being more than double that of females. Whilst the majority of claimants are aged between 25 and 49, with the highest rates among the 18-24 age group, (28.6%), 12.5% of the total claimants are registered as long term unemployed. Bradford East Constituency has the highest claimant rate of 6.3% and the wards most affected are Bowling and Barkerend, Manningham, Little Horton, Keighley Central and Tong. The lowest claimant rates are found in Shipley Constituency, and in the wards of Wharfedale, Ilkley and Craven. The number of live, unfilled jobs vacancies registered at Bradford's Job Centre plus offices was 2,247 in January 2011, with an average of 7 claimants per vacancy. Projected forward to the end of the plan period, there is a reasonable assumption that without intervention and proactive sourcing of new job opportunities, this rate of unemployment would continue.

Potential demand for Jobs over the Plan Period, 2011 – 2030

6.1.2 Economic inactivity is rising, the working age population is growing and current employment forecasts from the REM show little growth in jobs in the short term. Whilst the current economic trend indicates a growth of 27,000 jobs over the plan period, (approximately 1588 jobs per annum), the actual need is much greater. Table 6.1 provides an estimate of the growth of working age population by 2030. It gives a breakdown of the numbers that may be in employment and the numbers claiming 'out of work' benefits should current trends continue.

Table 6.1

Core Strategy employment and unemployment calculations

population projections	1		1
	Rate	No. at 2028	Change
Working age pop'	-	363,800	
Out of work benefits	15	54,570	
JSA	5	18,190	
In employment	62.6	227,739	

Previous calculation using 2008-based sub-national population projections

	Rate at 2013	No. at 2013	No. at 2030	Change
Working age pop ¹		324,900	352,700	27,800
Out of work benefits (DWP) ²	15.2	50,290	55,298	5,008
JSA ³	5.9	19,369	21,464	2,095
In employment ⁴	64.9	216,200	236,106	19,906

Updated calculation using 2010-based sub-national population projections

 2010-based subnational population projections, ONS
 Out of work benefits, DWP, February 2013, NOMIS
 JSA claimants at July 2013, NOMIS
 In employment total at April 2012 to March 2013, Annual Population Survey, NOMIS

- 6.1.3 Although working age population projections are available from ONS, and these are included in the table above, workforce projections, (i.e. projections of the working age population in employment and seeking employment), are not available. For this reason, benefit figures supplied by 'Job Centre Plus and the DWP have been used in this instance as a basis for projecting forward the number of people in the District seeking employment (JSA figures) and those not in work (DWP figures). These calculations illustrate the rising demand for employment opportunities in future years.
- 6.1.4 Table 6.1 above illustrates the rising demand for jobs for the Local Plan period, that is, until 2030. In order to attain full levels of employment in the District (providing jobs for everyone), the target number of jobs that would need to be created by 2030 is calculated as the projected increase in the number of working age population in employment (27,800) together with the projected number of claimants in total (76,762) which gives a total demand of 104,562 new jobs. However, achieving this degree of full employment is generally accepted as being unattainable. The figure includes those claimants who, for various reasons, are not actively pursuing jobs, are incapacitated or find it more advantageous in remaining as benefit claimants.
- 6.1.3 Because of this, the Core Strategy uses only the Job Seekers Allowance figure. This represents those unemployed who are actively pursuing jobs. The jobs target figure therefore comprises the increase in the number of working age population anticipated to be in employment at the end of the plan period (27,800) together with those projected to be on JSA, (21,464) which gives a new jobs demand of 49,264. This equates to **2897** new jobs that need to be created annually in all the sectors of the economy. As this figure represents all of the business sectors with variable numbers employed in each category, an accurate correlation to land requirement is not feasible.

6.2 Travel to Work and Commuting Between Districts

- 6.2.1 The 2001 census revealed information on how and where people travelled to work in the District. 77% of the working age population live and work in Bradford District, and 23% commute out from the District, 51% to Leeds, 25% to other West Yorkshire districts and 8% to Craven. Conversely, 44,895 people commute into the District, 33% from Leeds, 39% from other West Yorkshire Districts and 9% from Craven. A net total of 3472 people commute into the District for employment opportunities, implying a reasonably balanced distribution of jobs.
- 6.2.2 Bradford and Leeds is the heaviest commuter corridor between all the Leeds City Region Districts and the most balanced. A total of 41,500 people commute out and approximately 45,000 people commute into Bradford to work, a total of 86,500 commuter trips every day. 37,000 of these are made daily between Leeds and Bradford. 21,300 trips are from Bradford to Leeds and 15,300 are from Leeds to Bradford a net outflow of around 6000 commuters into Leeds. The main destinations for commuters are the city centres although significant numbers of commuters from Wharfedale work in north-west Leeds.
- 6.2.3 The majority of commuting trips in and out of the District are by workers in higher level occupations. Those people who are more highly skilled and working in higher level jobs are more likely to travel further for work. On balance, more high level workers (managers and professionals) travel into Bradford to work than travel out. Additionally there is a net export of lower level workers with more people in lower level occupations travelling outside the District to secure work than travelling in.
- 6.2.4 The balanced pattern of commuting means that there is no direct impact on the demand or supply of jobs and employment opportunities inside or outside the District. Consequently there is no apparent weighting for the provision of employment land providing jobs for residents of adjacent districts. However, the location of key strategic employment sites adjacent to local authority boundaries or linked by strategic transport systems however will have some local impacts on travel to work patterns.

6.3 Employment Land Review Projections of Land Requirement

6.3.1 The Employment Land Review in 2007 used the Regional Econometric Model to project employment change over time within the 'B' Class Uses. The model was modified to make it specific to the changing development profile expected to take place within Bradford District. It applied additional projected jobs growth that would be realized from regeneration projects that were expected to be completed across the District. This was termed as an 'unconstrained growth scenario'. By applying the floor space requirement by employee/job, using varying development plot ratios relative to sector or location, and incorporating a 5% existing property vacancy rate, overall industrial land requirement was then calculated. The ELR estimated the total net employment land requirement in an unconstrained growth scenario as approximately 214 hectares. In a constrained growth scenario, the economic outputs would be reduced by approximately 32%, giving a lesser figure of 148 hectares. The net employment land demand range for constrained and unconstrained growth was estimated as:

B1a 30 to 40 hectares
 B1b, B1c and B2 68 to 100 hectares
 B8 50 to 74 hectares

(I) Update of Employment Land Review Projections

- 6.3.2 Following the recent economic downturn the Council prepared an update of elements of the economic modelling process and employment data. A review of the principal sections of the Employment Land Review has been undertaken to ascertain what significant changes have taken place as a result of the recession. Updates have been made of the assessments of the employment land supply. Projected jobs growth and future land requirements have also been estimated following the same broad approach as carried out initially by consultants ARUP. The results of the review have been published on the Councils website alongside the ELR. The latest Experian Econometric Model projection has produced a forecast of 26,726 new jobs by the year 2028, an average of approximately 1572 jobs per annum. Of these, approximately 16,351 comprise 'B' Class Uses only. It has been calculated that this job growth equates to 154 hectares of employment land across the District. This is made up of:
 - B1 22 hectares
 - B2 57 hectares
 - **B8** 75 hectares

Limitations of REM

6.3.3 The projections produced by the REM and the Employment Land Review are based largely on trend based modelling of how the economy might perform in future years. In this respect it is questionable whether they are wholly complete and accurate assessments of jobs growth and related land need. The REM projections are extremely sensitive to small fluctuations in the performance of the local economy. With the recent trends in the economy, from buoyancy to recession and then followed by slow growth, the projected outturns have been particularly volatile and have varied widely. Despite earlier predicted economic growth, the March 2013 projected jobs growth figure is now much reduced. The REM suggests jobs growth of 11,000 in the B1 use class, 1,900 in B8 warehousing and distribution and a decline in general industry jobs. Broad calculations translate this figure into a requirement of 30hectares and 31 hectares respectively; a total of 61 hectares. With such significant variations, the model is used only to provide a general picture of performance in the local economy rather than a definitive calculation of employment land requirement. As an alternative. the trends in take up of land provided by the Council's annual monitoring process gives a clearer perspective on employment land demand for Bradford District. It demonstrates how the industrial property and investment market performs in Bradford through a range of contrasting economic circumstances. For this reason, the future demand calculation in Section 6.4 below is based on recent development trends.

6.4 Projected Demand for Employment Land Based on Development Trends

6.4.1 This section quantifies possible future demand for employment land based on the Council's annual employment land monitoring returns. The use of historic takeup rates for land developed for employment uses provides a general guide on past trends and gives a broad geographical indication of the preferred locations for business investment. Data from the early years does not take account of losses to other employment uses. More recent data accounts for this but does not differentiate between the specific Business Use Classes, B1a, b, c, B2 or B8.

- 6.4.2 General take-up of employment land in the District has been monitored as an annual total since 1993. Up until March 2013 the total take up of allocated employment land has been 258.7 hectares, a yearly average of 12.8 hectares. Development after-use has been monitored since 2001 by Use Class and by location, providing a better analysis of economic performance District wide. Between July 2001 and March 2013, the total amount of land developed for employment purposes under 'Use Classes' B1, B2 and B8 has been 105.8 hectares, an annual average of 9 hectares. During this period, the economy has emerged from the 1991 recession, through the economic peak of 2007/8 and also from the double dip recession of 2009/10. Given the wide range of economic cycles attained, this period provides a reasonable basis for future projection of employment land requirement. Extending forward the average amount of land developed for B class uses of 9.0 hectares to 15 years (the Plan period), this gives a total requirement of 135 hectares. However, this allocated land does not include the anticipated jobs growth in the retail, health and education and service sectors because these uses are usually planned around specific local service needs and local population changes.
- 6.4.3 Take up rates are shown in table 6.2 for the five parliamentary constituencies for the period between January 1993 and March 2013. All the data was calculated on a yearly basis and recorded as a gross figure relative to site development.

Constituency	Developed Employment Land (Hectares)
Bradford North	74.18
Bradford South	114.77
Bradford West	19.22
Keighley	37.15
Shipley	15.40
District Total	260.72

Table 6.2 Take-up of Employment Land, Jan 1993 – Mar 2013

6.4.4 The figures demonstrate investors' preferences for the particular locations within the District. The figures for Bradford South are dramatically uplifted by the 'Pro Logis' development at the former West Bowling Golf Course which in 2010 accounted for 22 hectares in a single development.

Constituency	Developed Employment Land (Hectares)
Bradford North	5.52
Bradford South	49.03
Bradford West	2.45
Keighley	8.37
Shipley	0.0
District Total	65.37

Table 6.3 Take-up of Employment Land, Mar 2006 – Mar 2013 (Recession Years)

- 6.4.5 Table 6.3 presents the take-up of employment land between 2006 and 2013 which were considered as the years when the District experienced the effects of the economic downturn and investment activity was less buoyant. It was in 2010 when the 'Pro Logis' scheme was substantially completed.
- 6.4.6 Across the District there is a considerable vacancy rate within the property market in the supply of office space, industrial land and buildings and in warehousing units. The Quarterly Report of Property Trends in the Bradford District for the period 1st July to 30th September indicated that at 1st October 2013 there were 105,135 sq. m. of available office space and 272,165 sq. m. of available industrial premises within the Bradford District. However, many of these properties are located in areas where there is little market demand, are isolated from, or have poor access to the Districts infrastructure. Some are in a poor state of repair, are in upper floors with substandard access, have listed building status or cannot be economically converted to accommodate the demands of modern industrial operations. There is also considerable turn around of these properties due to 'churn' with property moving on and off the market.

6.5 Providing for Jobs and Investment through Policy (EC2)

- 6.5.1 Maintaining a flexible and optimum supply of employment land based on past trends allows for ambitious economic growth. It also allows for a range and choice of sites to be available at any one time, accommodating land which is currently constrained but deliverable in the long term. It increases the prospects that the needs of inward investors or existing businesses in the District can be met as they arise. There is also a need to identify a portfolio of larger, more strategic sites in locations that would attract new inward investment. It allows for any churn, displacement or relocation of existing enterprises through planned urban transformation and remodelling envisaged in certain parts of the District such as the Canal Road Corridor. Such a strategy is consistent with the Council's goals for economic regeneration and job creation.
- 6.5.2 At the same time, it is acknowledged that land is a scarce resource and that there are competing needs within the District for homes, services and open space which need to be met. The allowance for flexibility of employment land supply will need to be balanced with the need to avoid unnecessary sterilization of land and the need to ensure that the quality, deliverability and accessibility of the land portfolio is addressed, as well as, its quality. It is within these parameters that Policy EC2 supports economic development and job creation by the provision of a portfolio of attractive sites that are targeted to the regeneration initiatives across the District. A supply of 135 hectares of employment land is therefore proposed.

7.0 THE SPATIAL STRATEGY FOR THE DISTRIBUTION OF EMPLOYMENT LAND

7.1 The Nature of the Current Supply of Employment Land in the District

7.1.1 The details of the existing supply of employment are set out above in Section 4.4. As of 1 April 2013 there are approximately 114.8 hectares of employment land with the benefit of established planning backing, identified within the District. Although this figure represents a large part of the estimated employment land requirement for the plan period, it does not necessarily provide the optimum supply. The majority of the sites are located sporadically across the District, are of inadequate sizes or they are better suited for other uses. There is a lack of variety, with a predominance of smaller sites of less than 5 hectares, and low quality sites with physical limitations such as poor accessibility and contamination. With the exception of a few strategic sites, the current supply can be generally characterised as infill or expansion sites and therefore unsuitable for alternative commercial uses. The nature of the existing supply means that it is a challenge to bring it all forward and market it for immediate availability to meet modern business demands. It is important therefore that the proposed 135 hectares of employment land will provide a range of size and type of sites to reset this imbalance. The analysis of the development potential of the sites from a market perspective in 2007 forms an appendix to the Employment Land Review.

7.2 A Strategy for the Development of the Existing Supply of Employment Land

7.2.1 The Employment Land Review concluded that many of the sites in the current supply were considered to be developable at some point in the plan period and worthy of retention subject to the overall scale of need and spatial strategy to be adopted. It presented a broad spatial strategy for the development of the supply of employment land in the District and this has been taken forward into the Core Strategy. The Review concluded that the supply of B1 office use is dependent upon the delivery of the Bradford City Centre and Airedale regeneration proposals. Residual demand is likely to be for B2 uses and provided for by most of the allocated RUDP sites and additional new employment land in Bradford urban area, particularly in the north and south (M606 corridor) of Bradford. The deliverability of allocated land in Airedale is dependent on proactive intervention. With significant employment land identified in Airedale, the strategy should be to prioritise the development of the allocated sites in Bingley in the short term followed by medium term supply in Shipley. The Keighley sites could be brought forward in the longer term. The study concluded that sufficient B8 demand could be provided at West Bowling due to the proximity of the site to the motorway network. Alongside this strategy, it also recommended proactive intervention within the existing employment areas at Bowling Back Lane in Bradford and at Dalton Lane in Keighley where there is a mix of older dilapidated property, some modern development and expanses of derelict sites.

7.3 Internal Economic Areas of the District

7.3.1 Based on an analysis of labour market flows and industry make-up, five functional economic areas have been identified within the District. Each has a distinctive economic space with different characteristics, influences and flows. The five areas are Wharfedale, Airedale, the Pennine Hills, City of Bradford and Bradford South. The Core Strategy places the City of Bradford as a single spatial entity which includes Shipley. At present, the key business sectors in these economic areas in broad terms are:

- Wharfedale Health, Financial and Business Services
- Airedale Manufacturing, Retail, Wholesale
- City of Bradford Retail, Financial and Business Services, Public
- **Pennine Hills** Education, Hotels/Restaurants
- South Bradford Manufacturing, Distribution
- 7.3.2 A number of masterplans, strategies and initiatives have been completed or are currently in preparation for these areas. Planning for these separate and distinct sub areas will allow the strengths and opportunities within them to be developed and exploited whilst avoiding duplication. The provision of jobs and distribution of new employment land in the Core Strategy will mirror these plans. The detailed distribution of employment land will be identified in the Allocations DPD and based on policies EC3 (B) and (C).

7.4 A Strategy for Identifying a Future Supply of Employment Land

Bradford Urban Area

The City of Bradford main urban area is currently the main location for 7.4.1 employment in the District and includes the greater majority of the District's major employers. There are clusters of the general and traditional industries located on the periphery of the City Centre, mainly on the north eastern and southern areas of the City. The urban area contains most of the allocated employment sites in the RUDP which will provide the initial trawl for future consideration. Bradford South has been the main focus for industrial development in recent years and most of the previously allocated sites have now been taken up. Local entrepreneurs and investors have expressed a preference for this part of Bradford due to its proximity to the motorway infrastructure and hence, logistics and distribution industries are well suited to this location. Area Action plans are currently being prepared for Bradford City Centre and the Shipley and Canal Road Corridor and these may provide evidence of future demand for specific types of employment sites. Elsewhere in the urban area, large sites accessible to the highway and which can accommodate large scale mixed inward investment including distribution operations are also required.

Bradford City Centre Regeneration

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

Airedale and the Pennine Villages

7.4.3 As identified in Bradford 2020 Vision, Airedale has always been, and remains, a place for employment and living. It forms a broad corridor that runs through the heart of Bradford District between Bradford City Centre to the South and Wharfedale to the North. Its influence extends beyond the District, being a vital economic component of the Leeds City Region. It is classed as a major employment corridor focused on high-tech companies and digital

communications. The Airedale Masterplan is focused on the economy so that it continues to deliver benefits to local people. It seeks to deliver realistic and practical solutions that will benefit businesses, support wider regeneration and stimulate economic growth in a creative connected corridor. A key part of this strategy is to provide for and support the development of key employment sites and the main towns are recognised as potential centres for increased economic activity. It is in these locations that sites will be identified through the later Allocations process. The Airedale Strategy also identified Esholt treatment works as an opportunity to release a large area of brownfield land of strategic importance, to create a research and development led technology business park. For the spatial distribution of employment land, the Pennine villages have been included with Airedale because a significant number of the residents travel to Airedale to work rather than to Bradford.

Leeds Bradford Corridor

7.4.5 Only nine miles apart, Leeds and Bradford's economic relationship has been defined as interdependent. This relationship creates opportunities for co-operation in delivery including joint marketing opportunities and shared approaches to inward investment and development. The Leeds and Bradford International Airport epitomises this link and provides a stimulus for economic growth to the north of the Bradford urban area. Bradford also has a reciprocal two way travel to work relationship with Leeds with similar numbers of commuters travelling between the two Districts and the economic synergy between Leeds and Bradford has the potential to stimulate greater market activity. There is ongoing collaboration between the two districts to foster this approach.

Wharfedale

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

7.4.7 Green Belt Locations

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

7.5 Summary

7.5.1 The strategy for identifying a future supply of employment land is therefore related to maintaining and supporting the central economic axis which runs through the District. This stretches from Keighley in the north, through Airedale, Bradford urban area with its interface with Leeds, the City Centre and the motorway corridor in Bradford South. There are also business linkages to be made with Craven to the north-west and to the Leeds-Bradford International Airport. It is these areas which will provide the focus for new employment opportunities and the detailed findings of the ongoing Area Action Plans and Local Plan documents will help inform the Allocations DPD on the distribution of new sites and determine their sizes and locations. The distribution of the 135 hectares of employment land in the Core Strategy is currently determined by population levels in the economic quadrants and allocated at this stage on a pro rata basis. As set out within Policy EC3, the planned requirement for 135 hectares of employment land will be partly met from the current supply of sites with established planning backing. Additional supply will be required and provided through new allocations across the District. The strategy is the provision of a varied employment land portfolio with a choice of size and type of sites together with the safeguarding of existing strategic sites that meet the requirements of the main growth sectors.

8.0 MANAGEMENT OF THE DISTRICTS PORTFOLIO OF EMPLOYMENT LAND

8.1 Development Management Policy for Sustainable Economic Growth

- 8.1.1 Policies EC1 to EC3 in the Plan have been derived from the Economic Strategies at both regional and local level. Whilst a strategy for economic growth includes provision of new sites for future employment needs, it is also concerned with the management of the existing industrial stock, retaining its function and ensuring that it continues to provide job opportunities for the District's residents and investment potential for the District's entrepreneurs. Policy EC4 sets out the approaches that will be used through the development management process to ensure.
- 8.1.2 Under Criterion (A) all sites submitted for consideration in the Allocations Document, together with the existing allocated sites in the Replacement Unitary Development Plan, will be assessed in terms of their deliverability, sustainability and their attractiveness to market demand. Those sites which do not meet these criteria will be considered for alternative uses
- 8.1.3 Under Criterion (B) the availability of suitable sites will be monitored on a 3 year rolling process. It is important to provide the market with choice and flexibility in their site selection. This provision needs to be available over realistic timescales to meet the needs of businesses, both for locally generated growth and inward investment, and thus avoid any stagnation in the market. It also allows for a degree of 'churn' in the market where sites necessarily stay vacant for a period of time.
- 8.1.4 Criterion (C) recognises that is important that existing sustainable employment sites are retained in employment use. The existing stock of industrial land provides a large source of employment for the District's residents. The central economic policy for the provision of new jobs is based on planning for jobs growth over and above the existing numbers. It is based on retaining the current businesses and jobs numbers within the District and providing new opportunities to account for new jobs. There is also a stock of older and cheaper premises which provide an element of choice for business enterprises. It is important to retain this resource, particularly in sustainable, mixed use locations. Many of these sites are vulnerable to higher value end uses, particularly housing. Land and buildings which are currently in use or were last used for business purposes will therefore be protected for business use. Changes from business use will only be determined by consideration of the following criteria: location, quality of buildings, layout, accessibility, adjacent land uses, functional redundancy, market significance and environmental impacts. Only, in these exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that a site is no longer suitable for such use, the Council may allow a change to other uses.
- 8.1.5 Criterion (D) recognises that there are key locations within the main urban areas where existing industrial and business uses predominate. In previous Development Plans they have often been identified as employment zones within which, only employment related uses can be accommodated. A number of these zones have come under pressure for other forms of use, usually housing led. It is considered that these zones provide a range of sites of varying quality and rental supply which can be of particular advantage to the development of young or lower level economic enterprises. Such concentrations of employment activity can also provide the impetus for new business innovation and growth. The

traditional employment activities of these areas will continue to play an important role in providing jobs for their surrounding communities. These zones will be reviewed as to their suitability for continued use solely as key employment locations.

- 8.1.6 Criterion (E) links to economic strategy at both local and regional level which give considerable weight to the creation of industrial or business clusters that are interlinked in the wider market process. This related activity provides certain advantages resulting in higher rates of innovation, business formation, and greater productivity, factors which contribute to a stronger local economy. The key economic sectors are financial and business, logistics and the construction industry. The regional priority clusters which are growing in the Bradford District are chemicals, food and drink and health care technologies. The Plan is supportive of the growth of these cluster activities already prevalent across the District. It will consequently be an objective of the Plan to provide sufficient land in particular locations which will enable the co-location of businesses which are important to the incubation of these emerging growth clusters. This will incorporate a range of sites for the development of SME's, incubator units, expansion space and the development of economic clusters. Support for cluster will embrace property and development needs, accessibility, linkages and access to labour pools.
- 8.1.7 <u>Creative and Digital industries</u> is a broad sector that includes electronics, microwave technologies, software applications, web design, film making, games design and animation. Bradford boasts some of the world's leaders in this sector, for example Pace which is located in Saltaire, is the world's third largest set top box maker. An established sector cluster is focused in Airedale and sites will be identified to enable their growth.
- 8.1.8 <u>Culture, Media and Tourism</u> have certain underlying linkages which will be exploited through the allocation of sites. The Plan will give particular support for these clusters as part of a wider sustainable tourism policy.
- 8.1.9 <u>Professional, Financial and Business</u> In order to support growth of office based uses, including the financial and business sector, it will be important to provide high quality sites in centres for high density development. The proposed 'Business Forest' in Bradford city centre will be the focus for new office development.
- 8.1.10 <u>Higher Education</u> The knowledge based industries linked to the University and College and the educational economy as a whole provide an economic stimulus to Bradford centre. It benefits from the skills emanating from them, the specialised employment and the wealth creation. The extensive student accommodation located on the edge of centre has developed its own unique economy, providing added value. In the wider District, Shipley College and Leeds City College (Keighley Campus) provide additional educational opportunities to support local commerce, particularly in Airedale and Wharfedale. The Council will work with these establishments to improve and develop their facilities thus sustaining the benefits that they bring to the city economy.
- 8.1.11 <u>Health Care Technologies</u> The three large hospitals located within the District, local health care facilities and associated technology industries, provide significant employment opportunities for the residents of the District. Support will be given to the growth and expansion of these facilities.

8.1.12 <u>Logistics</u> – Sites in south Bradford with good access to the motorway network will be identified as potential distribution facilities.

The other key sectors include Advanced Engineering and Materials, Environmental Technologies, Food and Drink Industries.

- 8.1.13 Criterion (F) relates to tourism and leisure. Bradford has been designated the world's first UNESCO City of Film and Saltaire model village is one of only two World Heritage sites in Yorkshire. The prestigious National Media Museum is among the most visited museums outside London averaging 650,000 visitors each year. With its vibrant theatre and cultural offer, unique local heritage and strong built environment together with varied and attractive landscapes, Bradford has generated a very successful tourist economy. In excess of 11 million visitors are attracted to Bradford District each year. A focus of the Council will be to capitalize on this trend, creating wealth and jobs. It will do this by adding to and improving the facilities and services available to visitors. Improvements and additions to the quality and diversity of existing attractions will also be encouraged. Opportunities for business and leisure based tourism and hotel developments are to be promoted in city town and smaller settlements. However the increased attractions in the smaller communities and villages have an impact on the amenity of local residents so a sustainable approach to the expansion of facilities is paramount. A policy of support will be given to appropriate sustainable tourism and leisure developments that increase the diversity and quality of facilities available to visitors and residents.
- 8.1.14 Criterion (G) relates to support for the District's rural economy. Two thirds of Bradford District is rural, interspersed with many villages and small towns. It has a population of 41,600 or 9% of the District's total. At 2.6%, rural claimant unemployment is low and recent jobs growth has been higher in the rural areas than urban areas. Home based working is growing and businesses in the Worth Valley area have benefited from the introduction of superfast broadband. Around 1,500 business units, mainly micro businesses, are located in the Districts rural areas providing 3.9% of the District's total jobs. The sector mix is similar to that in the urban areas. However, national analysis of business insolvencies has shown that businesses in market towns and larger villages have suffered more during the recession than in urban areas. Traditional farming is still important in Bradford's rural hinterland mainly on the lower elevations of the land to the west of the Bradford urban area. The industry supports around 800 agricultural workers in over 400 holdings.
- 8.1.15 Bradford's rural areas, its open spaces, its biodiversity and green belt designation are seen as a primary strength of the District and key to attracting new businesses and entrepreneurs. These qualities however present issues on how and where to locate development and promote growth whilst retaining the distinct rural characteristics. With anticipated expansion of many of the rural settlements it will be important in sustainability terms, to provide local sources of employment in local rural locations, using quality of place as an incentive to attract new business. The Plan will support farm diversification into new business opportunities, the creation of opportunities in sustainable locations and in doing so continue to protect the character of the countryside. Development in these circumstances will be supported with consideration given to location or spatial need, sustainability, environmental factors, design and green belt implications. There is a need to provide support for the agricultural sector and also to provide alternative employment opportunities to revise and restructure the rural economy and to make rural areas more enterprising. Rural parts of

Bradford have seen some diversification of its economy to tackle rural deprivation and exclusion. Diversification has been centred in tourism, agriculture technologies, small scale mineral activities and commercial enterprises. Expansion of the superfast broadband network to rural parts of the district is important to this diversification process.

- 8.1.16 Criterion (H) support the core economy policy of transformation of economic, environmental and social conditions is the basis for a mix of business and living accommodation. Live/work premises can provide opportunities for small scale entrepreneurs and new business start ups where a more flexible and affordable arrangement can help reach a successful outcome for the venture. The Plan will support live/work developments provided there is no overall loss of residential or employment allocated sites.
- 8.1.17 Criterion (I) supports the environmental standards for new economic development. Environmental policy in the Regional Spatial Strategy seeks to maximise renewable energy capacity in new developments and securing greater use of decentralised, renewable or low carbon energy by setting ambitious and viable targets. In advance of local targets being set in Development Plan Documents, new developments of more than 1000 sq metres of non residential floorspace should secure at least 10% of their energy from these sources. Such developments would include large modern industrial, storage and distribution units together with leisure developments, and commercial and retail centres. It is equally important that the buildings are energy sustainable and accord with BREEAM Standards. BREEAM is an environmental assessment method that aims to improve the environmental performance of buildings and the internal environments they provide. It is a credit based assessment covering the categories of 'Management', 'Energy', 'Water', 'Land Use & Ecology', 'Transport', 'Materials', 'Pollution' and 'Health & Wellbeing'. Categories are scored and then combined according to their weightings to produce an overall rating; Pass, Good, Very Good or Excellent or Outstanding.

8.2 Training and Skills

8.2.1 Following on from the Employment and Skills strategy in the Community Strategy, a key objective of the Core Strategy will be to maximise access for the working age population, resident within the District, to the local employment opportunities that become available. This can be achieved by improving access to skills, to training and to education. A continued dialogue between training providers, access to work services and local employers will be necessary to reduce the numbers of workless residents within the District. Such a programme will require incentives to secure partnerships with local businesses for packages of training and job entry opportunities through local labour agreements with new employers and inward investors. Agreements could be established through the development management process when major developments come forward with potential employment prospects for Bradford's residents.

9.0 CITY, TOWN AND DISTRICT CENTRES

9.0.1 This section provides an overview of how Core Strategy Policy EC5 on City, Town, District and Local Centres has evolved from the Core Strategy Issues and Options Stage (February 2007) through to Core Strategy Further engagement Draft stage (October 2011) to Core Strategy Publication Draft (February 2014). This section is structured to demonstrate conformity with national guidance, the evidence upon which the policy options have been derived, a summary of stakeholder input to date, policy justification with reference to the Sustainability Appraisal objectives and the evidence.

9.1 Core Strategy Issues and Options – Topic Papers (February 2007)

- 9.1.1 The Bradford District Core Strategy Issues & Options was published for six week public consultation from 16th February until 30th March 2007.
- 9.1.2 A series of eight Topic Papers were produced which focused on key topic areas in order to stimulate discussions surrounding the key issues, constraints and opportunities for development within the Bradford District during the Issues and Options stage. Town centre and retail issues and options were covered by Topic Paper No. 6 Community Facilities.
- 9.1.3 Paragraph 3.12 to 3.16 of Topic Paper No. 6 (Community Facilities) addressed "Access to Shopping Facilities" and presented a series of issues, questions and options.
- 9.1.4 The following key questions were posed during the consultation at the Core Strategy Issues and Options stage:-

Question 6.4

How should the Council ensure that all sections of the community have access to retail provision?

Question 6.5

Does the existing hierarchy and policy approach to sustain and enhance these centres best meet peoples needs?

9.1.5 The following Options were also presented at the Issues & Options stage:-

• Continue the hierarchy of centres currently identified in the RUDP

• Amend the hierarchy for example by re-designating Silsden and Queensbury from local centres to higher order status as significant freestanding settlements.

• Allow small-scale retail provision to meet more localised need in communities.

• Protect small shops in small villages and communities.

9.1.6 Topic Paper 6, Question 6.4 and 6.5 above sought to address the following **Initial Sustainability Appraisal** Objectives:-

Initial Sustainability Appraisal (February 2007) Objectives	Links to Topic Papers, Key Questions and Options
Improve the quality and range of services available within communities and connections to wider networks	Qu. 6.4 asks how the Council should ensure that all sections of the community have access to retail provision.
Create good cultural leisure and recreation activities available to all	Qu. 6.5 asks whether the existing hierarchy and policy approach sustains and enhances centres to best meet peoples needs.

- 9.1.7 The Statement of Consultation- Issues and Options Topic Paper (February 2007) provides a summary of the comments and the Councils response with regard to the Issues & Options public consultation stage on Topic Paper No. 6 (Community Facilities). The following provides a summary of the key issues identified from the representations received on the Core Strategy Issues and Options in relation to "Access to shopping facilities":-
 - The majority of respondents supported the need to protect small shops in small villages and communities and to allow small scale retail provision to meet more localised needs in communities.
 - Proposals for expansion or changes to the existing hierarchy need to be supported by an evidence base.
 - Proposals for expansion or changes to the existing hierarchy need to be supported by an evidence base.
- 9.1.8 The Council in direct response to the written representations received during the Issues and Options public consultation commissioned retail consultancy WYG to produce the Bradford District Retail & Leisure Study which was published in June 2008.
- 9.1.9 The Bradford District Retail & Leisure Study tested the existing RUDP hierarchy of retail centres and also made evidence driven recommendations for amendments to the retail hierarchy.
- 9.1.10 In response to option presented at the Issues and Options Stage to "Amend the hierarchy for example by re-designating Silsden and Queensbury from local centres to higher order status as significant freestanding settlements" the Bradford District Retail & Leisure Study confirmed that there was no evidence to justify re-designating Silsden and Queensbury from local centres to higher order status. However, a number of evidence driven recommendations from the Bradford District Retail & Leisure Study were taken forward into the Core Strategy FED (October 2011) as highlighted below.

9.2 Core Strategy Further Engagement Draft (FED) (October 2011) - Choosing the Preferred Approach

- 9.2.1 The Bradford District Retail and Leisure Study (2008) informed the preferred approach (Core Strategy FED, October 2011) to City, Town, district and Local centres and superseded the options which were presented at the Issues and Options stage (February 2007).
- 9.2.2 The Core Strategy objectives include strengthening the role and performance of Bradford City Centre and the town centres. Despite the recent growth in employment in these areas, the Districts city and town centres still require an economic, social and environmental "renaissance". These centres need to be regarded as the logical focus of local communities and efficient hubs of connected activity, accessible by public transport.
- 9.2.3 On this basis, this crucial role in achieving sustainable economic growth and investment in the District requires that these centres be made the prime focus of development. This focus must apply to all uses which generate large numbers of people movements, not just those traditionally associated with economic regeneration. The most competitive cities are doing the most to improve the quality and distinctiveness of their places and infrastructure.
- 9.2.4 In the Core Strategy Further Engagement Draft (October 2011), Mayo Avenue was proposed to be de-listed as a District Centre as it does not have the necessary range of uses to be considered a district centre or even a local centre. Mayo Avenue also lacks opportunities for expansion in order to provide the additional retail and service floor space. Mayo Avenue is therefore viewed as a free standing out of town centre destination (see paragraph 2.14, Bradford District Retail & Leisure Study, 2008).
- 9.2.5 Odsal was promoted as a new location for a District Centre to serve South Bradford. The Richard Dunn Sports Centre site and adjoining land has redevelopment potential for a new supermarket and a range of non retail services such as banks, building societies, restaurants as well as local facilities such as medical centre, bus terminus etc.
- 9.2.6 The following Local Centres were proposed to be delisted from the current hierarchy in the Bradford District Replacement Unitary Development Plan (see Section 13 of the Bradford District Retail & Leisure Study, 2008):
 - Bolton Junction Local Centre;
 - Buttershaw Local Centre;
 - Eldwick Local Centre; and
 - Shearbridge/Listerhills (Woodhead Road) Local Centre.
- 9.2.7 The following new Local Centres were proposed to be added to the hierarchy (see Section 14 of the Bradford District Retail & Leisure Study, 2008 for detailed justification):
 - Steeton with Eastburn,
 - Menston,
 - Riddleston,
 - Oakworth,
 - Harden,

- Cullingworth,
- Wilsden,
- Cottingley,
- Heaton,
- Sandy Lane,
- Low Moor
- 9.2.8 The Interim Sustainability Appraisal of the Core Strategy Further Engagement Draft (October 2011) concluded Policy EC5 seeks to strengthen the role and performance of existing city, town, district and local centres and therefore contributes positively towards SA objective 12 relating to improving the quality and range of services and SA objective 19 relating to investment and enterprise. The Interim SA then states that - concentrating and focusing development in the City and Principal Towns could affect the viability of the other towns and villages in the District. The policy seeks to ensure no adverse impacts on the vitality and viability of the City, Town, District and Local Centres, and gives priority to the worst performing centres.
- 9.2.9 The Interim SA concluded that Policy EC5 also allows for convenience retail and limited comparison retail to meet day to day needs. This further contributes positively to SA objectives 12 and 19.

Consultation Comments on Core Strategy FED Policy EC5

- 9.2.10 The Core Strategy FED Statement of Consultation (February 2014) provides a summary of written comments and the Councils response with regard to Policy EC5 City, Town, District and Local Centres. The following provides a summary of the key issues identified from the representations received to Policy EC5:-
 - Evening economy should be recognised as an important contributor to the local economy
 - Healthcare facilities and education facilities should be encouraged at ground floor and upper floor levels in the retail centres
 - Need to infrastructure to support city and town centres growth
 - Objection to the deletion of Buttershaw as a Local Centre
 - Objection to the deletion of Mayo Avenue as a District Centre
 - Objection to Local Centre designation for Sandy Lane

9.3 Core Strategy Publication Draft (February 2014)

- 9.3.1 The written representations made during the Core Strategy FED consultation process during 2011 and 2012 informed the Bradford District Retail & Leisure Study Update (May 2013) produced by retail planning consultancy WYG acting on behalf of the Council. The following provides the justification for the Core Strategy Publication Draft (February 2014) Policy EC5 City, Town, District and Local Centres with reference to the NPPF, the Bradford District Retail & Leisure Study and the Sustainability Appraisal.
- 9.3.2 Policy EC5 sets out the network and hierarchy of centres and the role each will play including the type and scales of development appropriate in each centre. Policy EC5 delivers on Core Strategy Publication Draft Spatial Objective 6, 7 and 10,

- 9.3.3 In line with the National Planning Policy Framework paragraph 23 27, Policy EC5 seeks to ensure the continued vitality of town centres beyond just retail. The policy defines a hierarchy of centres and sets local threshold when assessing the impact of planning application for retail, leisure and office development in an edge of centre or out of centre locations.
- 9.3.4 The Bradford District Retail & Leisure Study (May, 2013) assess the vitality and viability of existing centres and assess the capacity and need for additional retail and commercial leisure (cinema, bingo, bowling sectors only) floor space. The Bradford District Retail & Leisure Study has provided the evidence base for Policy EC5 as set out in the Core Strategy Publication Draft (February 2014).
- 9.3.5 The Study has highlighted that due to the current market conditions and the growth of internet sales, there is sufficient retail floor space in the District (if all extant planning permissions for convenience and comparison retailing across the District are implemented) up to 2028 (the Core Strategy FED Development Plan period) based on the current market share being retained.
- 9.3.6 The Council will therefore seek to prioritise city and town centres and focus on delivery of these extant planning permissions to ensure that all of the identified residual capacity up to 2030 is met in order to serve the future shopping needs of the District's community. The Council's priority is to retain its focus of resources on the implementation of The Broadway Shopping Centre redevelopment with its development partners. The Broadway Shopping Centre, scheduled to open by December 2015, will meet the city centre capacity for comparison shopping and is essential to help transform Bradford as a major shopping destination and enhance market share.
- 9.3.7 Based on the market share analysis drawn from the 2012 household survey and data on recent trends for commercial leisure facilities, the Bradford District Retail & Leisure Study has concluded that the existing commercial leisure facilities (cinema, bingo, bowling sectors only) in the District are satisfactory and the principal focus for the Council should be on retaining these facilities over the plan period
- 9.3.8 Following the representations received on Core Strategy FED (February 2011) Policy EC5, the Bradford District Retail & Leisure Study (May, 2013) revisited the hierarchy of centres, in particular the functionality of existing local centres. The Publication Draft proposes the following changes to the District Centres:
 - Mayo Avenue is de-listed as a District Centre
 - Bankfoot (Manchester Road), renamed Odsal District Centre is elevated from Local Centre to District Centre
- 9.3.9 The Publication Draft also proposes the following Local Centres are delisted:
 - Sandy Lane
 - Buttershaw
 - Eldwick
 - Shearbridge/Listerhills (Woodhead Road)

However, Bolton Junction is now included as a Local Centre.

9.3.10 The **Sustainability Appraisal** of the Core Strategy Publication Draft (February 2014) concludes that Policy EC5 has a positive impact on SA Objectives 10-14

by strengthening the role and performance of existing centres. Policy EC5 also has a positive impact on SA Objectives 18 and 19 by increasing job opportunities and supporting investment in existing centres. The SA confirms that Policy EC5 is compliant with the NPPF which seeks to ensure the vitality of town centres. The SA does not propose any mitigation measures with regard to Policy EC5.

9.3.11 In conclusion, Policy EC5 is in full compliance with NPPF paragraphs 23-27 and has been informed by the most up to date evidence in the Bradford District Retail & Leisure Study Update (May, 2013).