

# **Bradford Local Plan Core Strategy**

## Duty to Cooperate Statement

December 2014

<b>CONTENTS</b>	<b>Page</b>
1. Introduction	2
2. Duty To Cooperate	3
3. Strategic Context	4
• Strategic geography	
• Planning in Leeds City Region	
• Position of adjoining Local Plans	
4. Strategic issues in Core Strategy	20
• Housing	
• Gypsies and Travellers	
• Green Belt	
• Employment	
• Transport	
• Infrastructure	
• Habitats Regulations Assessment	
• Flood risk	
• Minerals	
• Waste Management	
5. Conclusion	

## **Appendices**

1. Strategic Transport Maps
2. Leeds City Region Statement of Cooperation (approved September 2014)
3. Leeds City Region Local Plan progress Position
4. Core Strategy Leeds City Region Duty to cooperate strategic issues table (endorsed October 2014)
5. key documents and links

## **Figures**

1. Leeds City Region Local Authorities
2. Leeds City Region Profile
3. Leeds City Region Spatial Priorities
4. Distribution of key journey to work movements across the City Region
5. Bradford SHMA Sub Areas
6. Median House Prices 2012

## 1. Introduction

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

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

1.2 Similarly, from an environmental perspective:

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

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

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

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

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

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

## 2.0 Duty to Cooperate

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

- Historic Buildings and Monuments Commission for England (English Heritage)
- Natural England
- Mayor of London
- Civil Aviation Authority
- Homes and Communities Agency
- Clinical Commissioning Groups
- National Health Service Commissioning Board
- Office of the Rail Regulator
- Highways Agency
- Transport for London
- Integrated Transport Authorities
- Highway Authorities
- Marine Management Organisation

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

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

2.8 Local Nature Partnerships (LNPs) are also prescribed in the regulations as bodies which local authorities 'should have regard to' given their role in the management of natural environmental assets, supporting biodiversity and, in particular, identifying Nature Improvement Areas. They are relatively new partnerships and have evolved from recommendations in the Natural Environment White Paper. Bradford is part of two Local Nature Partnerships which are at an early stage of development.

### 3.0 Strategic Context

#### Strategic Geography

3.1 The portrait below sets out the overview of the key strategic spatial issues which are relevant to the Core Strategy.

## Strategic Location

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

Figure 1 Leeds City Region Local Authorities

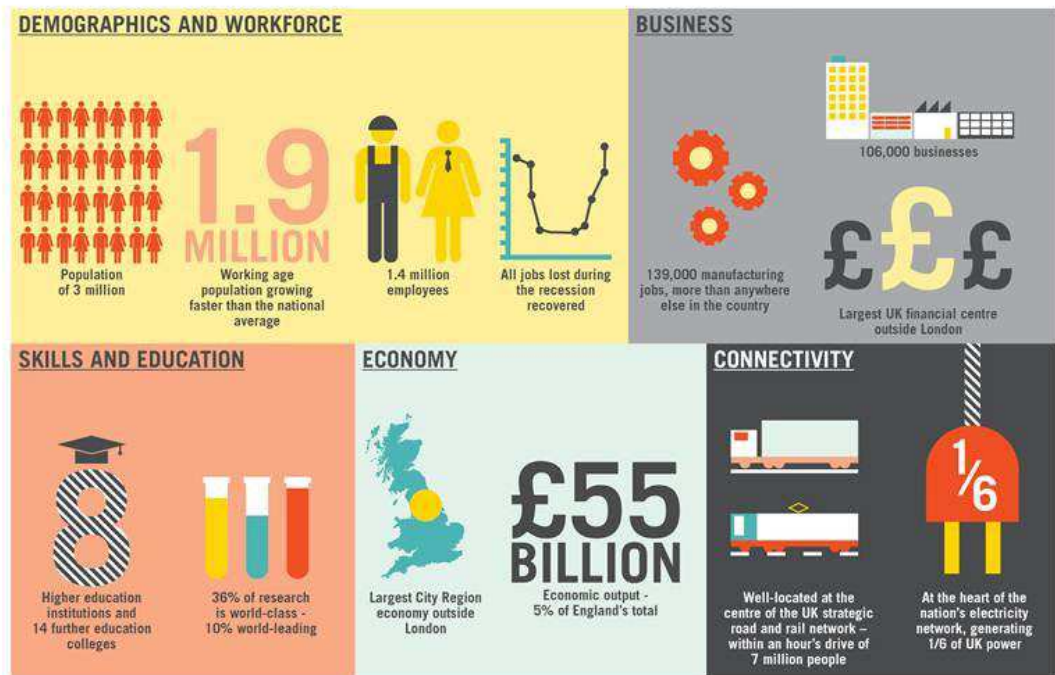


## Leeds City Region

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

Figure 2 Leeds City Region Profile

OUR ECONOMIC ASSETS



(Source; LCR SEP 2014)

- 3.5 In 2011, the LCR published an overarching LEP Plan, setting out a vision for the City Region. This approach was refined in the 2013 Investment Plan to include more detail on its key spatial priorities for investment in connectivity, housing and regeneration to support economic growth across the City Region. The LEP Plan and the Investment Plan together formed the basis for the further development of ideas presented in the Strategic Economic Plan submitted to government in March 2014 in support of its Growth Deal.
- 3.6 The Strategic Economic Plan (SEP) aims to unlock the full economic potential to become the growth engine for the north.
- 3.7 The Sep vision is that over the next decade and beyond it aims to:
- enable vibrant private sector growth, based on innovation and exports;
  - create a NEET-free City Region, with more and better jobs, and the skilled and flexible local workforce to sustain them;
  - become a lean, resource efficient economy underpinned by a 21st century energy infrastructure;
  - build a 21st century physical and digital infrastructure that enables us to reach our growth potential;
  - and we will make the most of the opportunities presented by HS2 – not just the economic gains from this step change in

connectivity, but also the regeneration of towns and cities across the City Region, and the jobs, new skills and business opportunities it will bring.

- 3.8 Connectivity and improvements to transport are a key element of the SEP and subsequent Growth Deal.
- 3.9 The LEP has established three categories of spatial priorities where either the growth opportunities or the level of market failure is of City Region significance: **strategic growth centres; strategic housing growth areas; and strategic employment and mixed use sites**. These are summarised in the map below.

Figure 3 Leeds City Region Spatial Priorities



(Source; LCR SEP 2014)

- 3.10 The growth centres of regional significance are the city and town centres of Bradford, Barnsley, Wakefield, Huddersfield, Leeds, York and Halifax, alongside the Aire Valley Leeds Enterprise Zone.
- 3.11 Housing developments, both small and large, will take place in across Leeds City Region. However, the SEP concentrates only on the largest proposed housing developments, contained within our Strategic Housing Growth Programme, that are close to delivery



and present the greatest investment opportunities. These include **Bradford-Shipley (Canal Road Corridor)**.

- 3.12 Additionally, the SEP has identified a number of other major development proposals that are progressing and will combine easy motorway and public transport access with proximity to towns and labour markets. The closest one to Bradford is Cooper Bridge – a strategic employment site in Kirklees between Brighouse and Mirfield, close to the M62 (J25) and with potential focus on manufacturing and engineering.
- 3.13 In July 2012 a ‘City Deal’ was agreed with government to boost jobs and growth, with Leeds City Region
- 3.14 The Deal gives Leeds and its partner Councils greater control over spending and decision-making to ensure interventions are in line with what our economy needs.
- 3.15 Work is currently underway on delivering the City Deal agreement, with the following projects and programmes already established in particular to support infrastructure improvements:
- 10 year £183m allocation of devolved major transport scheme funding to West Yorkshire and York
  - Pooling of business rates for West Yorkshire, York and Harrogate
  - £420m secured in 20 year deal through our [Local Growth Deal](#) to create the West Yorkshire plus Transport Fund envisaged in our City Deal
- 3.16 The Local Growth Deal extends the funding and powers already established through our City Deal to create jobs and begin delivering the ambitious agenda for growth outlined in the Strategic Economic Plan.
- 3.17 The Bradford Metropolitan District plays a major role in the Leeds City Region and beyond due to its size of population, and economy, proximity to other key centres, transport links and connectivity as well as its significant countryside and tourism offer.
- 3.18 These characteristics and what they mean for strategic planning are explored further below.
- 3.19 The Bradford Metropolitan District is characterised by a mixture of urban and rural areas with distinctive character and attractive landscapes. The topography of Bradford means most of the industrial and residential development is in the south of the district and along the valley bottoms, with the majority of the population

living in the urban centres of Bradford and within the freestanding settlements of Keighley, Bingley and Shipley, in Airedale, and Ilkley, in Wharfedale. While the urban areas are quite densely developed, two-thirds of the District is rural with moorland and attractive valleys surrounding and penetrating into the urban areas.

3.20 The City of Bradford is located on the key transport network with access to wider Leeds City Region in particular Leeds to the east. There being strong two way movement of labour between Bradford and Leeds and north Kikrlees and Calderdale.

3.21 The Airedale corridor links a string of communities from South Craven to the north through to Leeds in the east.

### **Population**

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

### **Deprivation**

3.23 Bradford is ranked high in the Index of Multiple Deprivation rank Bradford. It has the biggest gap between the ranking of its most deprived and its least deprived neighbourhoods. The most deprived areas in the district are concentrated in the inner city areas such as Manningham and Bradford Moor, and in Keighley. By contrast, the more affluent suburbs such as Ilkley, Ben Rhydding and Burley-in-Wharfedale rank among the least deprived areas in the country.

3.24 The District priority is to tackle deprivation though supporting a suitably skilled labour force, supporting economic development and regeneration and improved access to jobs both within the District and the significant opportunities within the Leeds City Region and beyond.

### **Economy**

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

3.26 A series of major companies have their headquarters in the District, including Morrisons, Yorkshire Building Society, Provident Financial, Hallmark Cards, Pace, Freeman Grattan.Holdings and Yorkshire Water. The city centre is a key driver accounting for 17%

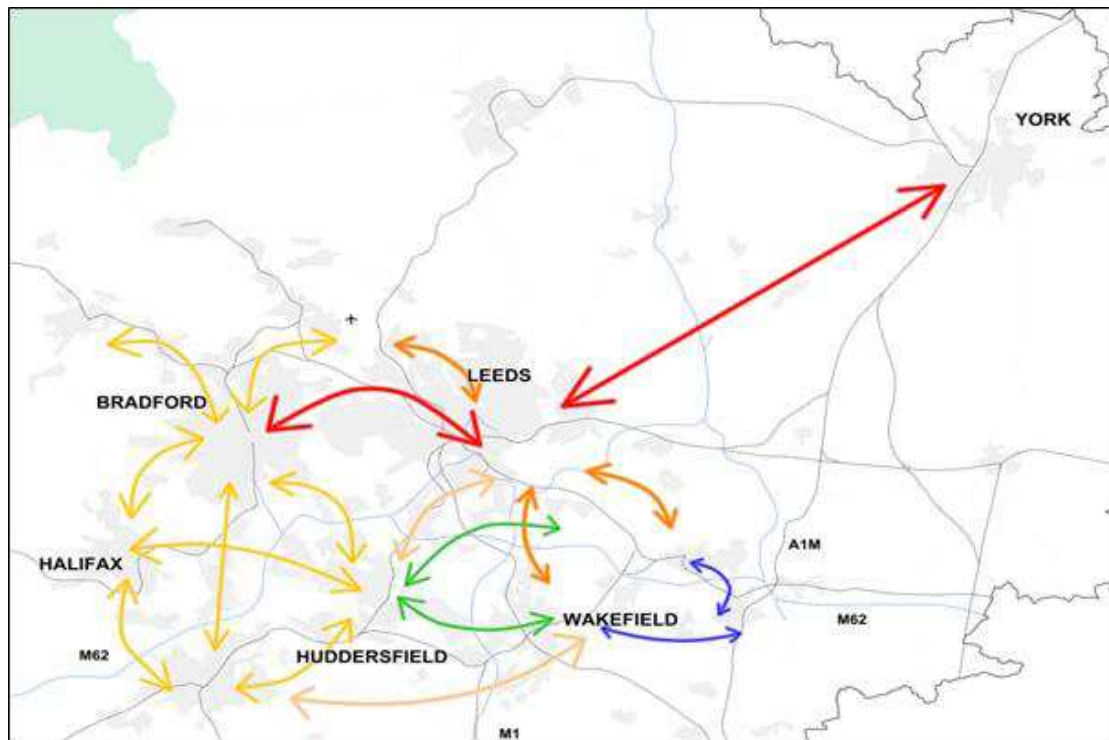
of all employment. Canal Road, Leeds Road and the M606 corridors are other major employment locations within the City of Bradford. Airedale provides the other key location for employment and is a well served transport corridor connecting the settlements of Keighley, Bingley and Shipley and beyond into north Yorkshire.

- 3.27 Manufacturing was traditionally the most significant sector. Bradford manufacturers produce a fifth of the district's economic output. There are 7,800 employees in high and medium technology manufacturing with growing tele-health and digital sectors.
- 3.28 However it is the service sector that dominates Bradford's economy with sectors such as business and professional services seeing the fastest growth in recent decades. The District is overly reliant on public sectors employers mainly in health and education. The majority of these jobs are located in Bradford City with Airedale and South Bradford less reliant on public sector jobs.
- 3.29 Worklessness and unemployment remain a significant issue for the District in particular young people. The highest concentrations of unemployment occur in areas close to Bradford City Centre and in outlying social housing estates such as Holme Wood, Buttershaw, Allerton, Thorpe Edge and Fagley. Unemployment is lowest in Wharfedale and the Pennine Hills. This pattern of under employment is reflected by patterns of deprivation.
- 3.30 Bradford City Centre is the main focus for economic, educational, administrative and cultural activity within the District. Accounting for 1 in 6 jobs in Bradford District the City Centre offers real potential as an engine for growth and regeneration. The City Centre Growth Zone will provide a focus for investment and will drive growth by providing a distinct offer to businesses wanting to locate or expand in Bradford City Centre.
- 3.31 There is a large, and increasing, student population within Bradford. The University of Bradford offers leading national research departments in management, peace studies and archaeology, and the institution has strong links with industry and the community. The development of Bradford's Learning Quarter is envisaged to help coordinate the investment activities happening around the University and College which in turn will facilitate development of high value knowledge-base businesses.
- 3.32 There is significant inter relationships with other LCR districts in terms of access to jobs with interdependencies between many adjoining areas in particular Leeds. As well as supporting economic development within the key areas within the District the Council has sought to improve accessibility to jobs both within the District as well as beyond especially within the Leeds Bradford Corridor where

there are significant populations including areas of deprivation and worklessness.

- 3.33 The figure below shows the relationships within LCR in terms of travel to work.

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



(Source; LCR SEP 2014)

## Housing

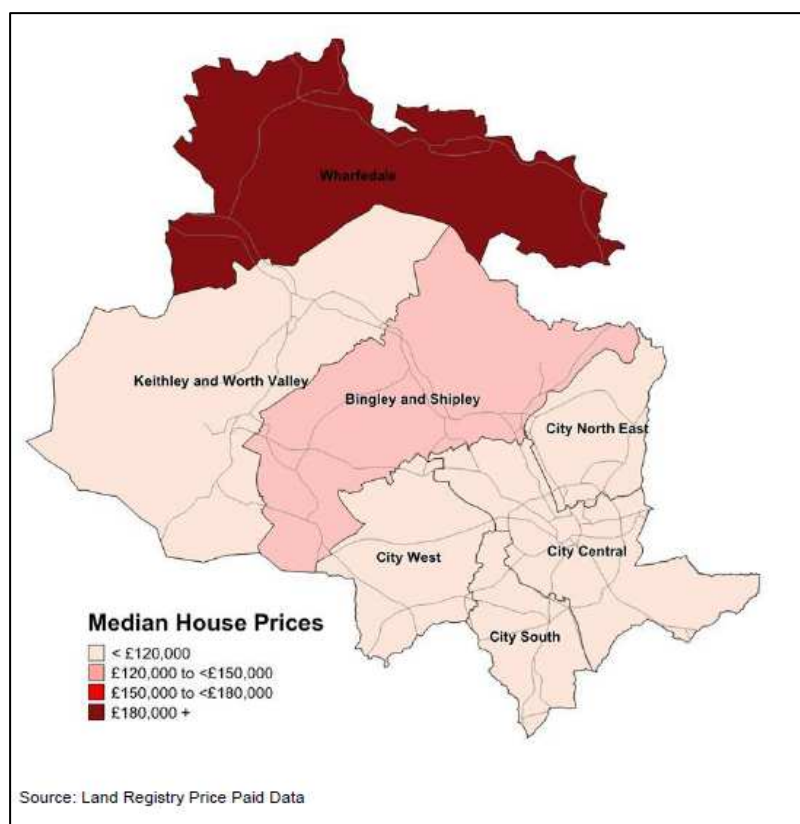
- 3.34 On the basis of a range of evidence the SHMA concluded that Bradford District can be considered as a self contained housing market area (albeit with strong links to adjoining areas within the Leeds City Region). The SHMA identifies that there are a number of sub areas within the district which exhibit broadly similar housing market characteristics.

**Figure 5 Bradford SHMA Sub Areas**



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

**Figure 6 Median House Prices 2012**



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

by natural change the current demand for core family housing products, such as houses with 2 to 4 bedrooms, will increase if there is not a strong focus on the supply on family housing. The district is expected to see significant growth in jobs over the plan period. The provision of an appropriate range of housing will play an important role in supporting the economy. A strategic priority is to ensure the District attracts and retains economically active households; delivering a range of good quality housing types will help to achieve this.

### **Transport and Connectivity**

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

- 3.46 Rail patronage in the District has increased significantly over the years and is expected to continue to be the dominant public transport mode in those corridors where it exists, notably in Airedale, where the rail network is at capacity (to and from Leeds) in peak times.
- 3.47 Air travel to and from Bradford is set to increase as the City is now connected to more frequent and wider national and international destinations through the Leeds-Bradford International Airport and Manchester Airport. LBIA is expected to play a much more important regional role in the future and thereby increase its contribution to the economy of the region.
- 3.48 In the long term good connections between all transport modes will be increasingly important for Bradford. The District is unlikely to create enough jobs on its own to meet the demands of a growing workforce, and therefore links with neighbouring Districts will be important to connect people with employment and housing.
- 3.49 The maps in Appendix 1 set out the current network and also emerging key areas of further work and development.

### **Environment**

- 3.50 One of the most striking features of the District is the quality of its landscape and in particular the proximity of the main urban areas to areas of high landscape value. The character of the District's landscape is very varied, ranging from the rugged open moorland of the South Pennine uplands to rolling farmland, and open river valleys to wooded hillsides. The habitats in the Bradford District are largely influenced by their underlying geology. The Millstone Grits of the Southern Pennines to the west of the District give rise to substantial areas of upland heathland and blanket bog, whilst the softer shales of the Coal Measures have produced more woodlands, valley wetlands and unimproved grasslands. The uplands support a wide range of bird species. The demand for development on the lower-lying Coal Measures has fragmented these habitats, although unique habitats have also been created throughout the District as by-products of industrialisation, such as reservoirs, canals and quarries.
- 3.51 The District includes part of the South Pennine Moors Special Protection Area represented by Rombalds Moor to the north of the District and Haworth Moor to the west of the District. The designation is in recognition of the importance of its breeding bird population. To the north of the District in Harrogate North Yorkshire is the North Pennines Special Protection Area.
- 3.52 The District's countryside attracts a large number of visitors from both within the district but also within the LCR and beyond. The Council is committed to countryside visitor management in partnership with the key stakeholders including adjoining Councils where appropriate.



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

#### **Built heritage**

- 3.54 Bradford District contains a rich and diverse built heritage which consists of the third highest number of designated assets in the Region and one of only two World Heritage Sites in Yorkshire. The architectural and historic wealth of protected buildings and 59 designated conservation areas are highly valued for the essential contribution they make to local distinctiveness and environmental identity. The built heritage is of benefit to the economy and tourism.
- 3.55 The outstanding value and universal interest of the World Heritage Site at Saltaire site is not only a unique asset to the District, but also invaluable in showcasing the rich heritage of the District to a wider audience.
- 3.56 The unique association of the Brontes with Haworth, the surrounding Pennine landscape and the wider district is demonstrated by sustained tourism. The District also benefits from designated historic landscapes and gardens, many of which are municipal parks, some restored to their Victorian glory and five with green flag status. A 16 mile navigable stretch of the Leeds and Liverpool Canal protected by conservation area designation with iconic historic structures such the Five Rise Locks, a historic battlefield and a complex assemblage of scheduled Bronze Age carved rocks demonstrate the wealth of heritage within the District.
- 3.57 The District also includes part of the Adwalton Moor which is on the English Heritage Register of Historic Battlefields. It is located to the South east of the District with the majority falling outside the District within Kirklees and Leeds Districts. The designation has implications for development within this area which should conserve and not harm the battlefield and setting where this is material to the designation.

#### **Cultural Attraction and Tourism**

- 3.58 The provision of cultural amenities is good in Bradford. Key cultural attractions include the National Media Museum, Haworth and Keighley and Worth Valley Railway, and Saltaire. Visitors are also attracted by the built heritage of the District.
- 3.59 Although the District has the advantage of a range and depth of major tourist attractions in Yorkshire, tourism industry is underachieving in terms of volume and value of both day and staying visitors. The key challenge is to lift the appeal and quality of some attractions and encourage people to make more visits. This also requires

improvements to essential infrastructure including transport connectivity within the District and beyond.

### **Strategic Planning in Leeds City Region (LCR)**

- 3.60 There has been a long legacy of strategic cooperation and joint work within the region. The Regional Assembly working collaboratively with the Local Planning Authorities and other key bodies led in the preparation of the Regional Spatial Strategy (RSS) for Yorkshire and the Humber (adopted May 2008) which provides the strategic context for the preparation of Local Plans in the Region. The Regional Assembly provided a strong forum for coordination and alignment on strategic planning issues backed up with strategic evidence and intelligence as well as regular monitoring.
- 3.61 In addition joint working (both officer and members), has also historically taken place at the sub regional level across West Yorkshire as well as the wider Leeds City Region arrangements prior to the formal establishment of the LEP. Other formal working arrangements are also in place, which relate to specific strategic issues e.g. Pennine prospects.
- 3.62 Following the Localism Act coming into force the Secretary of State revoked the Yorkshire and Humber RSS on 6 July 2010. This revocation was subsequently quashed by High Court ruling published 10th November 2010 and subject to the then emerging Localism Bill passing into law and further work on the Strategic Environmental Assessment which itself was the subject of consultation.
- 3.63 The Government published the updated SEA of the proposed revocation of the Yorkshire and Humber Plan in September 2012.
- 3.64 An order was laid before Parliament on 29 January 2013 to formally abolish the Yorkshire and Humber Plan from 22 February 2013, with the exception of the regional strategy's green belt policies for York which will be retained until York City Council adopts a local plan defining green belt boundaries.
- 3.65 In anticipation of the impending revocation of RSS, the Leeds City Region Leaders Board approved an Interim statement on 21<sup>st</sup> April 2011 which agreed to continue to follow key elements of the RSS in their ongoing developments plans.
- 3.66 With the revocation of RSS, under the Localism Act local planning authorities as well as other prescribed bodies have a new 'Duty to Cooperate' on strategic matters which affect more than one local authority. Leeds City Region Leaders agreed the broad approach to be adopted to facilitate this at their meeting on 6 December 2012 in light of the requirements of the Act and guidance provided in NPPF.

- 3.67 The Leaders Board agreed a common methodology to capture the 'beyond the plan area', implications for the strategic priorities set out in paragraph 156 of the NPPF and any additional matters that are identified and shown to have such implications. This approach enables the *common tracking* of the development of understanding of the 'beyond the plan area' implications of the relevant plan and the evolving response to addressing these matters as the plan passes through each stage of preparation.
- 3.68 In addition, it committed to the pursuit of joint approaches to technical work whenever this is practical and will seek to ensure alignment of approaches and methodologies where joint working was not possible or appropriate.
- 3.69 In support of the LCR approach Local Plan lead officers meet bi monthly on Duty to Cooperate matters together with other key bodies including Environment Agency, and the Highways Agency. This informs operational alignment and coordination of strategic matters across the LCR Local plans. It reports where required to LCR Heads of Planning who in turn report to Directors of Development. Updates are reported to the LCR Leaders Board on Duty to cooperate matters when required.
- 3.70 More recently a LCR Planning Portfolio holders meeting has been established which provides a member arena for considering strategic planning issues and looks to support Local Planning authorities to discharge their 'duty to cooperate'.
- 3.71 The approach which has developed to date and process for going forward has been formally approved in the form of a formal statement of cooperation. The 'Leeds City Region Statement of Cooperation' was approved at the Leaders Board at its meeting on 1 July 2014 and subsequently reported for information to the West Yorkshire Combined Authority on 18 September. The full document is reproduced in Appendix 2.
- 3.72 The Statement identifies how authorities within the Leeds City Region Partnership will work collectively going forward, but it also sets out existing good practice being applied by city region Planning Authorities, as well as setting out the actions to be taken and tools to be used in identifying and addressing cross-boundary issues.
- 3.73 Four high level principles that will influence a joint approach to meeting the Duty to Cooperate have been identified and included in the Statement. These are:
- **Cooperation throughout the development plan process:** the Duty to Cooperate is a statutory requirement for Local Plan preparation, implementation, ongoing monitoring and review; the

Duty to Cooperate therefore applies throughout the development planning process.

- **Going beyond consultation:** effective cooperation requires sustained joint working, identifying actions and achieving outcomes.
- **Taking a pragmatic approach:** not all issues will require cross-boundary cooperation and the scale at which cooperation needs to take place to achieve the most effective outcomes will be dependent on the nature of the strategic matter.
- **Responding to all requests to engage:** at a local level where planning authorities within the Leeds City Region partnership request input into their development plan process a response will be provided from other authorities in the partnership.

3.74 The statement sets out the agreed LCR duty to cooperate process (Section 3) as well as the approach to strategic cooperation (Section 4). The statement identifies several key thematic strategic issues and work streams which are taking place at the LCR to cooperatively understand and plan for these issues. The details of how Bradford has used the process and arrangements in place is set out below in Section 4.

3.75 The LCR Planning Portfolios Board intends to monitor progress with regard to implementing the commitments in the LCR Statement of Cooperation and will develop these processes, as required.

3.76 Outside the LCR arrangements the Local Planning Authority has worked directly with neighbouring LPAs and other bodies where relevant and appropriate on strategic planning matters on an ongoing basis. This has included sharing of data and information as well as discussions on strategy and policy content. These approaches and outcomes are set out below in summary.

### **Position of Adjoining Local Plans**

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

#### **Leeds**

3.78 The Core strategy has been judged sound following Examination and adopted in November 2014.

3.79 The Core strategy seeks to plan for Leeds Objectively assessed needs in full. The housing requirement set out in the Core Strategy is for

70,000 dwellings net to 2028. In order to meet the housing needs in full the Plan proposes a full green belt review.

#### Kirklees

- 3.80 The Core Strategy was withdrawn from examination in 2013. Currently at early stages of preparing single local plan.

#### Calderdale

- 3.81 Currently at an early stage of producing a single local plan.

#### Craven

- 3.82 At the early stages of preparing single Local Plan. Currently progressing on basis on meeting objectively assessed needs. Key settlements and areas of opportunity are in the south of Craven District including several settlements on the boundary with Bradford and linked into Airedale in terms of both road connectivity as well as rail.

#### Harrogate

- 3.83 Harrogate have a Core Strategy adopted in 2009 which was based on the now Revoked RSS. Currently preparing a single local plan which updates strategic policies including housing need following withdrawal of sites DPD.

#### Pendle

- 3.84 Published a pre submission draft Core Strategy for comment in October 2014. This seeks to plan for their objectively assessed need in full to 2030.

### **4.0 Strategic issues in Core Strategy**

- 4.1 In line with the LCR agreed approach a draft table which documents the key strategic issues for the Bradford Core Strategy has been prepared and developed in consultation with relevant bodies and Local Authorities. A Draft was issued in support of the Publications Draft in the General background paper. This first draft was developed through the LCR officer group arrangements and also the meetings /engagement with individual LPAs. This has been updated to reflect the further work and discussions following publication up to submission. The final version is found in Appendix 2. This version was formally endorsed off by the meeting of Portfolio Holders held on 13 October 2014.
- 4.2 The key strategic issues are outlined in more detail below with reference to how they have been developed including the evidence base, policy direction and the nature of any cooperation under the duty and the resulting influence on the plan.

## Housing

- 4.3 This sub section considers the approach to objectively assessed housing need, and strategic housing market geography.

### Housing Need

- 4.4 Up to revocation of RSS for Yorkshire and the Humber the emerging Core Strategy was based upon the housing requirement set out in the RSS which for Bradford was:

1560 dwellings 2004 – 2008

2700 dwellings 2009 - 2026

- 4.5 The figures within the RSS were not derived directly from one mathematical model or set of projections. Rather they are the result of the range of evidence and debate that has been considered through the process of preparing the Plan and latest evidence about household growth in the region at that time, including:

- Household projections (CLG 2003-based and 2004-based)
- The needs of the regional economy having regard to economic and job growth forecasts (from the Regional Econometric Model)
- Evidence about the availability of suitable land (including the regional audit of urban potential 2004)
- Evidence about the affordability of housing (including from the Regional Housing Strategy)
- Evidence about low demand and vacancy rates
- Levels of housing completions in recent years
- The findings of the Sustainability Appraisal, Appropriate Assessment and other information about environmental capacity

- 4.6 The scale of growth proposed in the RSS allowed for a step up approach which reflected the shift from the previous requirement in the RUDP of 1390 dwellings per annum.

- 4.7 While the Localism Act 2011 brought in a range of planning reforms including the removal of the regional planning element of the statutory development planning system, the Yorkshire and Humber RSS was not formally revoked until February 2013. The Core Strategy Further Engagement Draft (CSFED) published for consultation between October 2011 and January 2012 therefore was largely based upon the RSS. See Background paper 2 on Housing (part 1).

- 4.8 The interim strategic statement (2011) set out that *'the authorities in the partnership continue to support the broad policy thrust of the former RSS and the principles of urban transformation contained in the Plan' [The Yorkshire and Humber Plan, 2008]*. The Statement identifies a list of policies that authorities propose to adhere to from the approved RSS

to ensure that the above principles were retained. The statement did not address the issues of total housing need or distribution. This recognised the different positions the LPAs were at in the plan making process and emerging local housing needs work. The statement did recognise the need to ensure strategic alignment of the work across the local plans as part of the ongoing plan preparation and in discharge of duty by plan making authorities.

- 4.9 The local authorities within the city region partnership have all undertaken reviews of the evidence that underpins these policies as part of their plan making activities.
- 4.10 In light of the Formal revocation of RSS for Yorkshire and the Humber and the policy on housing need set out in the NPPF published March 2012 the Council commissioned GVA in partnership with Edge Analytics to undertake a Bradford Housing Requirement Study which was published in February 2013. The study involved extensive engagement with stakeholders including duty to cooperate bodies at key stages from draft methodology through to draft report and findings.
- 4.11 Further Housing Requirement Study Addendum Report was undertaken in light of updated Sub National Household Projections and issued in August 2013.
- 4.12 The Leeds City Region has commissioned a series of studies to better understand the strategic housing issues across the city region and support Councils in the discharge of the Duty to cooperate in terms of housing following on from the commitment noted in the Interim Strategy Statement.
- 4.13 Edge analytics where commissioned to produce 3 phases of work. These are:
1. Leeds City Region Demographic Forecasts 2012-31
  2. Review of Demographic evidence for the objective assessment of housing need within the Leeds City Region
  3. Detailed demographic modelling for Barnsley, Harrogate and Kirklees.
- 4.14 The Phase 1 work provided an initial overall assessment of housing need across the city region that informed the successful Growth Bid and Strategic Economic Plan.
- 4.15 Phase 2 focused on the LPAS which had already undertaken work to establish a local objectively assessed need. This recognised that while authorities within the LCR are at very different stages of plan development, the Leeds City Region sought to understand the approaches adopted by each authority to determining objectively assessed need and as far as practicable seek to align methodologies.

- 4.16 The phase 2 report provides a review of the demographic evidence supporting the objective assessment of housing need in each of seven LCR local authorities: **Bradford, Calderdale, Craven, Leeds, Selby, Wakefield and York**. Each of these seven authorities has either recently commissioned work to support its objective assessment of housing need, or it has an agreed position in its adopted plan based upon previous analysis. Three LCR authorities (**Barnsley, Harrogate and Kirklees**) have been excluded from this review process, with a more substantial update of underpinning demographic evidence likely to be required as a third phase of work.
- 4.17 The Phase 2 report does not provide *new* demographic evidence for the seven authorities but reviews methodologies, data inputs, assumptions and resulting scenario outcomes that have informed the objective assessment of need in the context of the generic framework considered for the LCR in Phase 1.
- 4.18 The report concluded that there was a high degree of commonality in terms of methodology between the respective local authority approaches including the use of POPGROUP model. However they did recommend further updates in relation to new data and assumptions. These include:
- implications of the new 2012-based ONS projection
  - latest jobs-growth forecasts from the REM
  - Assumptions from the 2011-based household model
  - Vacancy rate from the 2011 Census
  - Economic activity rates from the 2011 Census
  - Commuting ratio from the 2011 Census
  - Unemployment rates which reflect economic 'recovery'.
- 4.19 In addition it recommended that the household growth implications of the 2012-based household model be assessed when available.
- 4.20 The Council commissioned a further Housing Requirement Update report from Edge Analytics in order to implement the Bradford specific recommendations of the 'Leeds City Region report. More specifically the work included updating the scenarios generated by the POPGROUP model utilising: :
- Economic activity rates from the 2011 Census
  - Commuting ratios from the 2011 Census
  - Unemployment rates which reflect economic 'recovery'.
- 4.21 Secondly it utilised the newly issued 2012 based sub national population projections (the two 2013 studies has used rebased 2010 based projections); Thirdly it incorporated the latest (June 2014) jobs-growth forecasts from the Yorkshire and Humber Regional Econometric Model (REM) , updating the April 2012 statistics used in the original HRS.



- 4.22 Both of the housing requirement studies of 2013 resulted in the establishment of a range within which the Bradford housing requirement should be set. The update work carried out by Edge Analytics produced a revised range which was slightly lower than those within the original studies. This stemmed in the main from the slightly lower rate of expected population growth revealed by the 2012 based projections. However the housing requirement within the CSPD was still within the revised range - the only difference being that the Core Strategy proposal now lay towards the top of the range rather than in the middle of it. The Council therefore concludes that the updated work continues to show that the CSPD housing requirement is sound and will meet the objectively assessed needs of the district and significantly boost housing supply

### Housing Market issues

- 4.23 A housing market area is defined as “a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work” (Planning Practice Guidance Revision date: 06 03 2014)
- 4.24 Planning Practice Guidance identifies that housing market areas can be broadly defined by using three different sources of information as follows:
- House prices and rates of change in house prices
  - Household migration and search patterns
  - Contextual data (for example travel to work area boundaries)
- 4.25 A range of material has been gathered in the SHMA and SHMA update to help identify market drivers and the characteristics of housing markets across Bradford District and linkages with other areas. The 2001 census provides an analysis of travel to work patterns and the extent to which residents in Bradford District travel to other areas and how many people commute into the District. Overall, 78.6% of Bradford District’s residents in employment work in the District. The pattern of commuting is dominated by outflows to Leeds but this is compensated for by strong inflows from Calderdale and Kirklees, resulting in an overall net inflow of commuters into Bradford.
- 4.26 House prices across Bradford District have increased 160% over the period 1999 to 2012, with median prices rising to £129,950 during 2007 and, following a slight fall, reaching £119,725 in Q3 2012. The median price across the District has been consistently lower than both the regional and national median price. House prices in the district are highest Wharfedale. The 2010 SHMA reported an income to house price ratio of 6.1 however latest data from the SHMA update (2013) indicates a ratio of 7.1 indicating that relative affordability has deteriorated. Compared with other districts Bradford ranks as the 10th most affordable District, with an income to house price ratio of 7.1

(which compares with a ratio of 7.6 for the Region). However, this table masks wide variations within the District and some areas such as Wharfedale exhibit ratios similar to least affordable areas in the Region.

4.27 An analysis of migration data suggests that at least 76.8% of household move within the District. There are strong migration and travel to work linkages with neighbouring districts, most notably Leeds, and to a lesser extent Calderdale, Kirklees and Craven. Data also illustrates how the relative importance of these linkages varies within Bradford District. It is therefore recognised that it is important that policies consider and take into account the differing roles sub-areas have within Bradford District and specifically how this relates to wider linkages with the Leeds city-region and North Yorkshire

4.28 The Strategic Housing Market Assessment (2010) and update (2013) considered the issue of the extent to which Bradford District can be described as a distinctive housing market and the degree of market interaction with other areas as well as sub market areas within the District. This was considered in light of the guidance and advice in place at that time. This is set out in section 3 in both reports.

4.29 Paragraph 3.3 of the update concluded that:

*The CLG suggests that a market is self-contained if at least 70% of households moving originate from the same area. The 2010 SHMA concluded that Bradford District can be described as a self-contained housing market area, with 76.8% of households moving within the District and 78.6% of residents working in the District. This corroborates the findings of Regional SHMA work prepared by ECOTEC<sup>17</sup>. That said, there are strong interactions with neighbouring authorities, in particular Leeds. The release of 2011 migration and travel to work statistics later in 2013 will confirm the extent to which these levels of self-containment have changed since the 2010 SHMA.*

4.30 The housing market geography of the city region is complex and it is recognised that authorities need to work together to understand housing market geography and identify where there may be matters which cross Plan boundaries that need to be considered as part of plan preparation. To support the work of individual authorities the City Region Partnership commissioned a short analysis of the housing market geography of the city region which was undertaken by Andy Haigh Associates and reported in May 2014.

4.31 This report concluded that while they District Housing market was considered self contained in terms of the key indicators as set out in the respective SHMA there were smaller scale housing market relationships in particular relationships between the large west

Yorkshire districts – Bradford and Leeds - and their smaller neighbours in north Yorkshire which may have implications in planning for housing.

4.32 Paragraph 62 concluded that:

*“The analysis in this report has shown that the housing market geography of the city region is complex and to an extent contested. That said, it is clear that there are cross boundary housing market relationships between Plan areas in the city region and in districts that adjoin the city region. These relationships have been identified in the foregoing analysis and provide a good start point for joint working. However it will be the individual authorities to take forward this work in respect of the local implications and to determine the exact nature of strategic relationships and determine appropriate responses in Plans.”*

4.33 It recommended a further update to the analysis of housing market geography of the City region and its immediate neighbours when the full results of the 2011 census are released.

4.34 It also recommended that Districts where potential cross- boundary relationships have been identified should work together (and with the County Council in the two tier area) to establish the implications of the relationship and what joint action (if any) may be required.

4.35 The Council has engaged with the key adjoining authorities through the LCR arrangements and through direct contact about the nature of these relationships and are content that they do not warrant a change of approach and the basis for treating Bradford as a single self contained housing market for the purposes of the objectively assessed need.

### Gypsies and Travellers

4.36 Core Strategy sets out in policy HO12 the approach to ensuring it meets the needs for Gypsies and travellers including travelling show people. For the period 2008 to 2030 It identifies the need to plan for:

74 pitches for the gypsy and traveller communities;  
22 pitches for travelling showpeople

4.37 The need was identified in the 2008 West Yorkshire Gypsy and Traveller Accommodation Assessment. The Assessment, commissioned by the West Yorkshire Housing Partnership, was completed by CRESR (the Centre for Regional Economic and Social Research at Sheffield University) in May 2008. The study is compliant with Government guidance on such studies and used both primary and secondary data and research.

- 4.38 Several LCR Councils have undertaken more recent District updates in order to inform their emerging Local Plans Eg Leeds and Wakefield. In recognition of this the LCR has sought to ensure alignment of methodology and approaches. This has been done through the LCR governance arrangements through sharing of information and approaches and engagement at key stages in the assessment development.
- 4.39 In order to confirm the Core Strategy's policies with regards to the scale and type of need for pitches for Gypsy & Traveller and Travelling Showpeople in Bradford District are sound, the Council commissioned an update assessment undertaken by ARC4. There were 5 elements to the study as follows:
- To provide an up to date evidence base for the formulation of policies within the Core Strategy relating to Gypsies and Travellers and Travelling Showpeople;
  - To review and update the content and conclusions of the Bradford related elements of the 2008 West Yorkshire Accommodation Assessment;
  - To inform the Local Plan with regards to the scale, size, and type of accommodation needed to meet current and future need over the plan period to 2030;
  - To test the content of Policy HO12 of the Core Strategy publication draft document;
  - To produce a study which reflects current national planning guidance and which will be capable of withstanding scrutiny at Examination In Public
- 4.40 Initially there were discussions with Calderdale to undertake a joint study but this was not pursued given differing timetables. However, a copy of the brief for the study was sent to Calderdale, Leeds, and Wakefield Authorities for their comments on our approach and they considered it as appropriate.
- 4.41 ARC4, who have considerable experience in G&T Accommodation Assessments, informed the Council of their detailed methodology. It included close liaison with the G&T communities and in particular their locally recognised representatives, 'Leeds Gate'. Early in the process ARC4 set up a liaison meeting involving the various departments of Bradford Council who work with the G&T community, Housing and Special Needs Groups together with the CE of Leeds Gate. The meeting examined the detailed process of the study and opportunities to reach those comparatively inaccessible groups within the G&T community.

- 4.42 The Conclusions of this work will be made available prior to the examination and may require a change to the headline pitch requirements as part of examination process. Initial draft conclusions are not suggesting a significant headline change to the pitch figures in Policy HO12 will be required.

### Green Belt

- 4.43 The Core Strategy identifies the need to review the Green Belt as established in the RUDP adopted in 2005 under exceptional circumstances to meet in full the objectively assessed need for housing and also to provide a better quality supply of employment land.
- 4.44 The revoked RSS set out under Policy YH9 the approach to Green Belt in the then emerging LDFs. Criterion A recognised the importance of the Green belt in West Yorkshire in particular in supporting concentration of development and urban renaissance. Criterion B recognised that there was likely to a need for Green belt change to meet the RSS requirements in particular the further scales of growth. Criterion D noted that s strategic review of the West Yorkshire Green Belt may be required to deliver longer term housing growth. Further guidance on any strategic green belt review was to be issued as part of the Partial Review due to take place in 2011 which did not happen due to national changes to regional planning.
- 4.45 The Core Strategy is been based upon meeting its objectively assessed needs. In doing so there has been a recognition that the scale of growth would be likely to require change to the adopted green belt under exceptional circumstances. This was confirmed by the work on the first SHLAA and more recent update which informed the Publication draft. In recognition of this the Council commissioned, following the Further Engagement Draft consultation, the Growth Study which sought to review all the land around the settlements using a consistent methodology and rating. As part of element one of this work, a high level assessment of the strategic function of green belt was undertaken. This confirmed that the scales green belt change could be accommodated without prejudicing the strategic function of green belt.
- 4.46 In response to representations received at Further Engagement Draft Stage in particular from Leeds CC Policy SC7 was amended to restate the functions of green belt in any review and also consider as part of any review strategic function of green belt in coming to any detailed new boundaries in the Allocations DPD.
- 4.47 The Council will seek to address in detail strategic function of green belt through the production of a green belt methodology paper which will be subject to consultation and engagement.
- 4.48 The Core Strategy recognises the scale of change to green belt could be significant within the plan period up t to 11, 000 homes. Given the

plan period scale of change and related land supply and environmental constraints together with the uncertainties of future need beyond 2030 the plan does not propose to allocate safeguarded land. The Council believes that in allocating in full for the plan period development needs that the land supply will last beyond the plan period due to the occurrence of windfall within the plan period. A longer term review of green belt will be required at a strategic level beyond the plan period in conjunction with other LCR Local Planning Authorities. This is recognised in the LCR Duty to cooperate table and endorsed by the other LPAs.

## Employment

- 4.49 Core Policy SC1 sets out the key approach to development within the District including regeneration and economic development. This recognises the need to deliver this within the wider context of the LCR growth potential and ambitions. This reflects the complex interrelationships in particular the labour market of a polycentric conurbation.
- 4.50 Section 5.1 of the Core Strategy sets out the policies related to the District's economy and job creation. The vision for the District in the Core Strategy is one of economic transformation with the strategic objective to 'Promote and support a successful growing economy with a wide range of high quality employment opportunities by fostering indigenous firms and by attracting inward investment in the high value creative, innovative and knowledge based industries'. There are 5 specific policies that will help sustain future economic growth. The first of these, 'Creating a Successful and Competitive Economy' is a fairly broad, overarching policy which establishes the operational priorities for stimulating and managing the economy in spatial terms across the District. It sets the context for economic delivery mechanisms, restructuring and diversification to bring about jobs and prosperity. Policy EC2 is concerned with supporting business and job creation more directly. It sets out an aspirational number of jobs (2897 annually) which would have to be created in order to keep pace with population growth and future jobs need as determined by the Office of National Statistics and the Department of Work and Pensions. It also sets a figure of 135 hectares of new industrial land for economic investment and growth. Policy EC3 identifies the potential sources of this supply and the distribution across the District, with 100 hectares in Bradford, 30 hectares in Airedale and 5 hectares in Wharfedale. Policy EC4 sets out a range of mechanisms that will help manage economic and employment growth in a sustainable manner, protect existing commercial stock and, through the development management process, ensure that the right types of economic developments are directed to the most appropriate locations and in keeping with the local environment. The final economic policy, EC5 'City, Town, District and Local Centres' establishes a hierarchy of centres in the District and

sets the principles for their development and management in order to sustain their vitality and viability.

4.51 At the Yorkshire and Humber level several key strategies, particularly the Regional Spatial Strategy (RSS) and the Regional Economic Strategy, informed the development of the economic section of the Core Strategy. Coordinated working on strategic matters has more recently been undertaken at the City Region level through the Leeds City Region Local Enterprise Partnership (LEP). 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 LEP 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

4.52 This 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 and the 5 policies relating to Economy and Jobs in the Core Strategy are derived from and consistent with this strategic vision. Meetings have been held with representatives from the Leeds City Region and Leeds LEP to outline the Council's approach to planning for the local economy and to ensure a consensus of agreement.

4.53 There were no issues raised as part of the process in terms of scale of development being proposed and key locations. Issues linked to infrastructure to support growth in key locations has been identified and will be considered in more detail as part of the Allocations DPD.

## **Transport**

4.54 The strategic approach to transport in the Local Plan reflects the RSS and also more recent work within not only Bradford but West Yorkshire and the wider LCR.

- 4.55 The transport study undertaken for the Local Plan by SDG assessed the impact of the various settlement options as well as the preferred option on the road network and public transport system. This identified key corridors and issues which would need further work as the plan evolved towards site allocations. It also informed engagement and activity across West Yorkshire and Leeds City Region on those strategic transport issues and initiatives described below.
- 4.56 Local Authorities and the former Integrated Transport Authority in West Yorkshire have a long history of working together and with key partners (such as the Department for Transport, Highways Agency, Network Rail and train and bus operating companies) on strategic transport issues affecting the region. Over these years the authorities have developed three Local Transport Plans – the current LTP extends from 2011 to 2026 - and have delivered a huge range of transport projects either individually or in joint arrangements with other partners.
- 4.57 Strong governance has facilitated the delivery of these programmes and projects with senior Council elected members and officers being actively involved in developing policy and strategy and ensuring delivery against objectives.
- 4.58 The Local Authorities and ITA were heavily involved in developing the Leeds City Region Transport Strategy and, more recently, Leaders of Bradford, Calderdale, Kirklees, Leeds, Wakefield and York authorities and the Chair of the then ITA have agreed in principle for over £1bn of funds to be specifically targeted at transport measures aimed at increasing employment and productivity growth. This is intended to reverse decades of under-investment and create a world- class infrastructure for West Yorkshire and York.

### **West Yorkshire Plus Transport Fund**

- 4.59 Work in developing the West Yorkshire Plus Transport Fund referred to above was informed by emerging Local Plans growth strategies - including both economic and housing plans. A 'long list' of projects were identified by partners and these were tested in an Urban Dynamic Model (which contained authorities' housing and employment growth aspirations) to determine which would offer the best value for money in terms of increased Gross Value Added per pound spent. The schemes prioritised within Bradford provide key strategic infrastructure improvements for the District itself and improvements to transport links to, and within, other Districts which will also benefit Bradford residents seeking to access employment.



## Strategic Transport Coordination

### Transport in the Leeds City Region Strategic Economic Plan

- 4.60 The West Yorkshire Combined Authority (WYCA) was established on 1<sup>st</sup> April 2014 to oversee investment worth £1.5bn in West Yorkshire and York's transport and economic infrastructure. The WYCA is made up of Leaders from the constituent Authorities and the Chair of the LEP. Two key Committees provide advice to the WYCA Board on Transport and Investment issues.
- 4.61 WYCA has also taken over the previous responsibilities of the Integrated Transport Authority including leading on the development and delivery of the LTP, provision of public transport information, public transport infrastructure management and development and delivery of major new initiatives such as public transport SmartCards.
- 4.62 Individual local authorities both within and adjoining West Yorkshire continue to work closely with WYCA on strategic issues and WYCA officers and members attend meetings related to development issues in those authorities. The strong relationships built up with other partners identified earlier also remain intact.
- 4.63 Further work has been undertaken alongside the continued development of the West Yorkshire Plus Transport Fund to prepare the Leeds City Region LEP Strategic Economic Plan which secured the Local Growth Deal approved by Government in July 2014.
- 4.64 The Strategic Economic Plan is a 6 year plan, setting out LCR's economic ambitions and how the LEP will work with its partners to achieve them. It identifies an ambition to deliver an additional £5.2bn in economic output and an extra 62,000 jobs in Leeds City Region by 2021. Transport has specifically been identified as a key priority in the SEP under 'Delivering the infrastructure for growth'
- 4.65 The Local Growth Deal includes:
- £573m between 2015 – 2021 from the government's Local Growth Fund to deliver the ambitious economic agenda outlined in the LEP's Strategic Economic Plan – with £73m of new funding confirmed for 2015/16
  - £420m between 2015 – 2035 to deliver the West Yorkshire Plus Transport Fund
- 4.66 As well as the projects identified in the West Yorkshire Plus Transport Fund a range of other projects to support growth identified in the Local Plan were included in the SEP but were not supported through the

Local Growth Fund. However, these projects, such as the Shipley Eastern Relief Road and improvements to the Bradford Outer Ring Road, remain priorities for the Council and further opportunities for securing funding for these key projects will be sought in partnership with LCR authorities.

## **Strategic Road Network**

- 4.67 Bradford is served by the Strategic Road Network which is managed by the Highways Agency. Direct access is taken from the M606 which has its northern terminus at a junction with A6177 Bradford Outer Ring Road. The District also has a key indirect connection via the A650 to the south east.
- 4.68 From formal representations made at the FED and Publication Draft stages key issues for the HA relating to the Local Plan include:
- impact on the M606/M62 and their junctions with the local road network from further employment development around the M606 and the potential impact of Holme Wood Urban Expansion on the M62 motorway;
  - impact on the SRN of increased net out-commuting from Bradford;
  - impact of development in the Leeds Bradford Corridor on the A647/A6110 route to the SRN;
  - interest in positive impact of public transport investments on the strategic network;
  - interest in potential for park and ride facilities.
- 4.69 The Council has had regular engagement with the Highways Agency throughout the preparation of the Core Strategy and will continue to do so. In particular at FED stage, as well as noting comments raised by the Highways Agency, the Council provided housing and employment evidence from the Core Strategy to assess through the Highways Agency Network Analysis Tool (NAT). This informed ongoing engagement.
- 4.70 The outputs of the analysis undertaken by the HA were illustrated in the form of a new mesoscopic model (replacing the previous M62/M1 VISSIM model). This model was used to assess the performance of the Strategic Road Network (SRN) at 2018 and 2028, firstly with only committed schemes and secondly with new schemes to try to address the problems that were forecast to emerge.
- 4.71 The outputs of the modelling were used to compile an Infrastructure Study for each of the five West Yorkshire Districts setting out the impact of development on the SRN and identifying potential solutions with broad order of magnitude costs. The implications of future

demand on the SRN were discussed with the Council on 19<sup>th</sup> December 2012 and the outputs provided an input to the Infrastructure Schedule in the Infrastructure Delivery Plan. They also provided an indication of issues emerging on the local road approaches to junctions on the SRN.

- 4.72 The Council continued to engage at key stages when compiling and updating the Infrastructure Delivery Plan.
- 4.73 More recently the Council has been sharing evidence and attending workshops with the HA as part of their work in developing new route strategies for the Strategic Road Network. These are identifying investment needs on the network and are key to identifying the investment plans for the step change in funding on the strategic road network announced by the Government in [Investing in Britain's Future](#). They are seen as a smarter approach to investment planning and support greater participation in planning for the network from local and regional stakeholders.
- 4.74 Using the information held by Highways Agency, and that of other stakeholders including Bradford Council, the HA have drafted evidence reports for the 18 routes making up the strategic road network. In February, the Highways Agency shared their working drafts and asked for views of stakeholders. Since then the HA have continued to update the reports.
- 4.75 The evidence reports for all 18 routes were published on the HA website. The evidence reports identify performance issues on routes and anticipated future challenges, take account of asset condition and operational requirements, whilst gaining a better understanding of the local growth priorities.
- 4.76 Route strategies are a move towards a more evidence-led way of investment planning. Consequently these reports are an objective presentation of the evidence and, as such, don't make recommendations on what should be prioritised.
- 4.77 The evidence is being used to take forward a programme of work to identify possible solutions for a prioritised set of challenges and opportunities. The HA will combine this work with current programme development, including operations and maintenance to produce overarching route strategies by March 2015. These route strategies will establish outline operational and investment priorities for all routes in the strategic road network for the period April 2015 – March 2021, and give an indication of the priorities beyond March 2021.
- 4.78 The most recent discussions with the HA suggest that major proposals will be announced in the Chancellor's Autumn statement that will support growth in Bradford and West Yorkshire and address some of the issues that have arisen during the Local Plan process.

## **Local Road Network and Key Strategic Transport Corridors**

4.73 The transport study undertaken by SDG referred to earlier identified 10 corridors where demand on the existing highway network would be likely to increase significantly. Nine of those ten routes are likely to carry notable volumes of cross boundary traffic as follows:

- A650 Tong Street (to / from Kirklees / Leeds / SRN)
- M606/M62 (on SRN to / from all WY Districts and beyond)
- A6036/Little Horton Lane (to / from Calderdale through Northowram / Shelf)
- A647 (to / from Leeds)
- A641 (to / from Calderdale and Kirklees)
- A629/A644 ( to / from Calderdale)
- A629 ( to / from Craven)
- A65/A6038 (to / from Leeds / Craven)
- A650 through Airedale (to / from Craven)

4.79 Previous work with the HA to assess the impacts on the SRN and identify potential mitigation measures has been described earlier, as has the input of Local Plan proposals to the work on the West Yorkshire Plus Transport Fund. Three of the corridors identified above are to be specifically addressed by schemes already identified in the WY+TF (A650 Tong Street, A641 Bradford – Huddersfield, A647 Bradford – Leeds) and further studies will be undertaken on the other corridors, in parallel with site allocation work, to determine whether funding from the Highways Efficiency and Bus Package element of the WY+TF could be allocated to those key locations on those corridors.

4.80 A meeting with neighbouring local authorities, WYCA, the HA and Network Rail specifically to outline work done to date, receive feedback and help confirm and identify areas for further activity was held on 24 October 2014.

4.81 The key issues confirmed and identified relating were as follows:

- Discussions required with Kirklees and Leeds on impact of Holme Wood Urban expansion on north west Kirklees / south east Leeds;

- A need to examine more closely the impacts of growth on A65 and A657 in Leeds;
- Consideration to be given on impact on Bradford's network to emerging major new development proposals in north and north east Calderdale;
- Craven continue to be keen to work with Bradford on cross boundary cycling route on Leeds Liverpool Canal towpath
- Craven have aspirations to develop a rail station at Crosshills which could relieve commuter pressure on Steeton / Silsden station
- Assess impacts on rail capacity and infrastructure of new rail franchise specification when it is released later in the autumn;
- Review 2011 census information for insight it could give on cross boundary movements;
- WYCA were keen to see CIL contributions used to develop transport infrastructure but it was appreciated that the level of CIL in some parts of the District would be limited due to viability issues

## **Rail Issues**

- 4.76 Bradford Council has frequent meetings on a wide range of rail issues with Network Rail, WYCA and rail operators. Recent and forthcoming meetings include the following that have direct relevance to the growth aspirations contained in the Local Plan:

Calder Valley Line Development Group

Calder Valley Project Board

East Coast Main Line Authorities

HS2 Connectivity Work stream

Bradford Interchange and Forster Square Masterplan Board and Working Groups

- 4.77 The Council is also taking a key role in discussions about rail electrification and devolution across the north of England.

## **Summary**

- 4.78 The above commentary demonstrates the mature working relationships that the various partners involved in strategic and local transport development in West Yorkshire have developed over many years. There is no reason to believe that these relationships will not continue

into the future and enable the transport implications of the Local Plan to be addressed through partnership working both within the local plan and outside.

### **Infrastructure (not transport)**

- 4.79 One of the core planning principles of the NPPF is that planning should *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.....'* (Paragraph 17). The NPPF further states that in drawing Local Plan the LPA should *'identify priority areas for economic regeneration, infrastructure provision and environmental enhancement'* (Paragraph 21).
- 4.80 The NPPF also requires local planning authorities to set out the strategic priorities for the area in the Local Plan which should include strategic policies to deliver *'the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk ..... the provision of health, security, community and cultural infrastructure and other local facilities.'* (Paragraph 156). Crucially, Local Plans *'should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework'*. (Paragraph 157).
- 4.81 The Council has been proactive in infrastructure assessment and frontloaded this into its local plan preparation at the earliest opportunity. A draft Local Infrastructure Plan (LIP) and a Baseline Analysis reports were published and extensively consulted upon alongside the CSFED as part of the public consultation process across the district in 2011-12. The Council engaged with Statutory Bodies, neighbouring Local Authorities, Town and Parish Councils, amenity and interest groups, developers, infrastructure providers, various under-represented groups and members of the general public.
- 4.82 The LIP methodology has been informed by guidance in the Planning Advisory Service (PAS) Infrastructure Planning & Delivery Resource book. The methodology has also been influenced by the approach adopted for the Regional Integrated Infrastructure Scoping Study for the Yorkshire and Humber and similar studies from across the country. Previous studies, including 'Shaping Neighbourhoods' (Barton H. et al., 2003) have been useful in establishing methods and any standards.
- 4.83 A West Yorkshire Officers' Group (now known as the Leeds City Region CIL and Infrastructure Officers Group) was set up to share good practice and experience of preparing and updating Infrastructure Plan. Officers from Bradford attended the meetings which were held on quarterly basis. The group functioned as a technical, non-decision making team primarily to share practice on governance arrangements

and establish a common methodology which can be used to prepare Infrastructure Plan within each individual authority.

- 4.84 The purpose of the Draft LIP was to provide an infrastructure capacity assessment for the District which included consulting with physical, social and green infrastructure providers to establish what infrastructure provision there is in the district, and identifying any gaps or capacity issues within the existing provision. The draft LIP also provided an initial assessment of what infrastructure will be required to support development within the District over the plan period and how it could be implemented. This process mainly involved desk based analysis, liaising with critical infrastructure providers (Highways Agency, Environment Agency, Education, NHS), and discussions with those responsible for infrastructure delivery within the Council.
- 4.85 At this stage of the infrastructure planning process, the areas of infrastructure that are critical for the delivery of the growth and visions of the Local Plan Core Strategy were focused upon to ensure that there are no significant barriers. However, following the public consultation, the technical workshops and continued discussions with infrastructure providers it was considered that further works in relation to particular infrastructure areas need to be undertaken both to quantify the scale of gaps and determine future associated costs of delivery. There were also a need to link the LIP into new potential areas of funding, currently Sec 106 contributions but in future either a Community Infrastructure Levy (CIL) or a tariff based approach.
- 4.86 Consultant Arup were then commissioned in April 2012 to gain further and accurate information across all infrastructure types and also to review and update the draft LIP in partnership with the Council.
- 4.87 Further technical assessments were carried out on each of following infrastructure types: Transport; Utilities; Telecommunications; Flood Risk and Drainage; Waste and Recycling; Green Infrastructure, Open Space and Public Space; Sport, Leisure and Recreation; Education; Community and Cultural; Health; and Emergency Services.
- 4.88 Meetings were held with a wide range of organisations and Council departments and services including:

Council Departments, Services and Teams: Development Plans; Major Development Team; Asset Management; Housing; Transportation and Highways; Economic Development Services; Minerals and Waste; Environment and Neighbourhood; Design and Conservation; Libraries, Museums and Galleries.

External Infrastructure Providers such as Bradford and Airedale NHS; West Yorkshire Police; West Yorkshire Fire & Rescue; Yorkshire Ambulance Service; Environment Agency; Highways Agency; Yorkshire Water; National Grid.

- 4.89 A full list of internal contacts within the Council and external organisations consulted is included in Appendix C of the LIP. The majority of these meetings were attended by an Arup and a Council Planning Policy Officer.
- 4.90 The updated LIP thus provides a framework for coordinating and focusing investment and action across different departments within, and different stakeholders with responsibilities and interests in infrastructure. Through the work on the LIP the Council is also aware of many proposed schemes that may lead to cross boundary issues. These are explicitly recorded in section 5.7 'Cross Boundary Issues and Duty to Co-operate' of the LIP. Work is ongoing in partnership with neighbouring local authorities to address these issues and also to set priorities and explore options for funding.
- 4.91 The Local Infrastructure Plan is based on information currently available and should be able to respond to changing needs and circumstances over the plan period. Consequently it is intended to be remain as a 'live draft' and will be reviewed and updated regularly taking account of all the changes as they come forward.

#### Habitats Regulations Assessment

- 4.92 The Council has worked with Natural England to address issues raised by them in relation to the Habitats Regulations Assessment work and to seek additional advice that clarifies their position in relation to issues raised. The HRA Report and key outputs of the work have now been agreed and the Council will seek to make progress working towards identifying delivery mechanisms for the range of management and mitigation measures identified

#### Flood risk

- 4.93 The Council has worked with the Environment Agency to produce the Level 1 Strategic Flood Risk Assessment, to set out information relating to strategic level testing and to start to scope key issues in relation to flood risk testing parameters linked to individual sites. A sequential testing paper will be produced to set out this information in sequence.

#### Minerals

- 4.94 Section 5.5 of the Core Strategy sets out the policies related to minerals safeguarding and extraction including sandstone, sand, gravel, fireclay, coal and other hydrocarbons. The evidence underpinning the policies is set out in the accompanying Minerals Evidence Base Report and includes British Geological Survey resource



appraisals, feedback from previous consultation exercises and the guidance set out in the NPPF.

- 4.95 The primary objectives of the minerals policies set out in the Core Strategy are to secure sustainable supplies of the construction minerals vital for the economic development of the District and the quality of planned built development, without causing an unacceptable level of harm to people and communities or the historic and natural environment, and also to promote the recovery of minerals from development sites. The key pieces of evidence which underpin these policies are the resource maps which reveal the location of the District's mineral assets and data on the level of demand and quantity/distribution of supply and reserves of minerals.
- 4.96 To assemble the necessary evidence the Council has worked extensively with neighbouring authorities both through bilateral discussions and meetings, through consultation exercises and through the Aggregates Working Party, which the Bradford Principle Minerals Planner sits on. The NPPF requires every mineral planning authority to carry out a Local Aggregate Assessment (LAA) each year. This is a new obligation and comes on top of the need to establish a (regional) Aggregates Working Party and carry out annual monitoring of the production and supply of aggregates.
- 4.97 In the Yorkshire and Humber Region the authorities collectively decided to compile four LAAs; one covering North Yorkshire, one covering the Humber, one covering South Yorkshire and one covering West Yorkshire. A West Yorkshire LAA has been prepared using information from the 2012 producers' survey and other information provided by all five districts. The LAA has been subject to consultation with neighbouring authorities and the Aggregates Working Party. This consultation period has now closed and an initial analysis of the comments received indicates that objections to the content of the LAA are minor in nature and therefore it is likely that the LAA will be adopted substantially in the same form as the consultation draft.
- 4.98 The process of developing the LAA and arriving at a consultation draft took place concurrently with the process of preparing the Publication Draft Core Strategy and Submission Document. The evidence of the patterns of supply of construction minerals within the Region contained with the West Yorkshire LAA, in particular, was vital in terms of understanding the role of Bradford as a Minerals Producer. This evidence highlighted the District's primary importance as a Building Stone supplier and the District's reliance upon maintaining supplies of minerals from Neighbouring Authorities and in particular Sand and Gravel from North Yorkshire and Crushed Rock from the Peak District and Derbyshire.
- 4.99 To safeguard the future supplies of construction minerals from neighbouring authorities which will be necessary to facilitate the

planned development of the District, Bradford engaged with neighbouring authorities by making consultation responses to their draft LAAs emphasising the economic importance to Bradford of maintaining the supplies of concreting aggregates, road stones and other minerals into the District. This engagement has resulted in the publication of LAAs by neighbouring authorities which confirm a commitment to maintaining minerals supplies at a level which will allow continued exports, including into Bradford for the foreseeable future. Contingency arrangements are also being explored in terms of the January 2014 Leeds CC Marine Aggregates Study which Bradford has been involved with.

- 4.100 Through the methods of engagement with neighbouring authorities summarised above Bradford has ensured that our Minerals policies appropriately promote the sustainable further extraction of the District's building stone, crushed rock, sand and gravel and fireclay resources. The supply of building stones from the District in particular has a regional/ national significance and our policies will ensure that the country continues to benefit from the high quality building stones the District has been historically renowned for. In a reciprocal arrangement neighbouring Authorities have planned in their LAAs to continue supplying Bradford with the high quality construction aggregates which cannot be produced indigenously. This engagement has resulted in a sound and deliverable plan and fulfilled the Council's Duty to Cooperate in respect of Minerals.

### Waste Management

- 4.101 Policies WM1 and WM2 create a strategic planning framework to minimise the negative effects of the generation and management of waste on human health and the environment. The strategic policies encourage a reduced use of resources, and favours the practical application of the waste hierarchy. One of the primary mechanisms of applying this application is the delivery of an adequate range of waste management facilities to ensure waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District.
- 4.102 Earlier drafts of the WM1 (including the Publication Draft) have stated sufficient capacity will be located within the District to accommodate forecast waste arisings of all type. However, following updates to the more detailed waste arisings and further work on Duty to Cooperate this will not be the case. The Local Plan will seek to provide for a range of new facilities to meet the need to deal with tonnages of Commercial and Industrial (C&I) and Locally Authority Collected Waste (LACW) arisings, with other waste streams including Agricultural, Construction, Demolition and Excavation Waste being managed in-situ where they arise. However, hazardous waste and residual waste will continue to be exported outside of the District to other local authority areas.

- 4.103 The Waste Management DPD will set out the detailed planning framework for the management of waste arisings within the Bradford District, setting out a vision, objectives and detailed planning policies for all waste streams. Site allocations and statements for identified LACW and C&I waste sites will also be set out. The DPD is currently due to reach publication stage early 2015. The Council has engaged with key stakeholders at each stage of production, with additional targeted consultation with neighbouring authorities who currently receive Hazardous and Residual waste arisings from the Bradford District. Firstly, emails and phone calls were made to these neighbouring authorities to identify the correct officer for further contact regarding hazardous and residual waste. Once relevant contacts were identified, further contact via email was made, setting out detailed information on the waste movements (including tonnages). The local authority contacts were then informed of the proposed approach of not allocating sites for hazardous waste and residual waste, and thus the movements would continue, with views sort on this approach.
- 4.104 This additional consultation has been undertaken in light of the fact that hazardous and residual waste movements are likely to continue following the adoption of the DPD. The Council are of the opinion there is not sufficient need within the Bradford District to justify allocating sites for the management of Hazardous and Residual wastes.
- 4.105 Since 2011 officers representing the Waste Planning Authority for their unitary or county authority have been meeting on an ad hoc basis to discuss cross boundary minerals and waste issues. However, in 2013 it was considered that a more formal agreement was required and following further discussion, the inaugural meeting of the Yorkshire and Humber Waste Technical Advisory Body (Y&H WTAB) took place on the 4 April 2014. The Y&H WTAB is chaired by the Head of Planning from NYCC and members consist of officers from the Y&H region who represent their Waste Planning Authority, it also includes officers from the Environmental Agency. A Memorandum of Understanding has been drawn up for the Y&H WTAB, which was ratified by Leeds City Region Heads of Planning at a meeting on the 25 July 2014. The MOU outlines the purpose of the group, which is, amongst other matters, to underpin effective cooperation and collaboration between the Waste Planning Authorities in the Yorkshire & Humber area. Additionally, North Yorkshire County Council took the lead on drawing up a paper for the Y&H WTAB "Yorkshire & Humber Waste Position Statement", which was agreed by officers and also taken to the LCR Heads of Planning on the 25 July 2014 for consideration and agreement. The position statement is a rolling document that will be updated on a yearly basis by the Y&H WTAB. Through the Y&H WTAB there is on-going officer dialogue, an example being the recent issue on landfill capacity in the WY area.

## **5.0 Conclusion**

- 5.1 The Statement sets out the approach to discharging the 'Duty To Cooperate'. It demonstrates that the Council has met the legal requirements for ongoing constructive and positive engagement as part of the development of the Core strategy. The early stages have been underpinned by the RSS and subsequently the Leeds City Region arrangements which have provided a formal framework for dealing with duty to cooperate issues. The LCR arrangements have been supplemented by more detailed work with individual authorities and bodies as appropriate to the strategic issues.
- 5.2 The Statement also sets out the outcomes from the engagement and how they have been addressed and where relevant how the issues will continue to be addressed outside of the Core Strategy and into other Development Plan Documents.
- 5.3 It should be noted that this statement sets out a summary of duty to cooperate activity on key issues to demonstrate legal compliance and further detail is available if required.

## **Appendix 1**




### **Strategic Transport Maps**




- 1. Existing Transport network**
- 2. Improved highway efficiency proposals**
- 3. New and improved highways**
- 4. Rail and NGY proposals**

## Bradford District - Existing Transport Network



### Key:

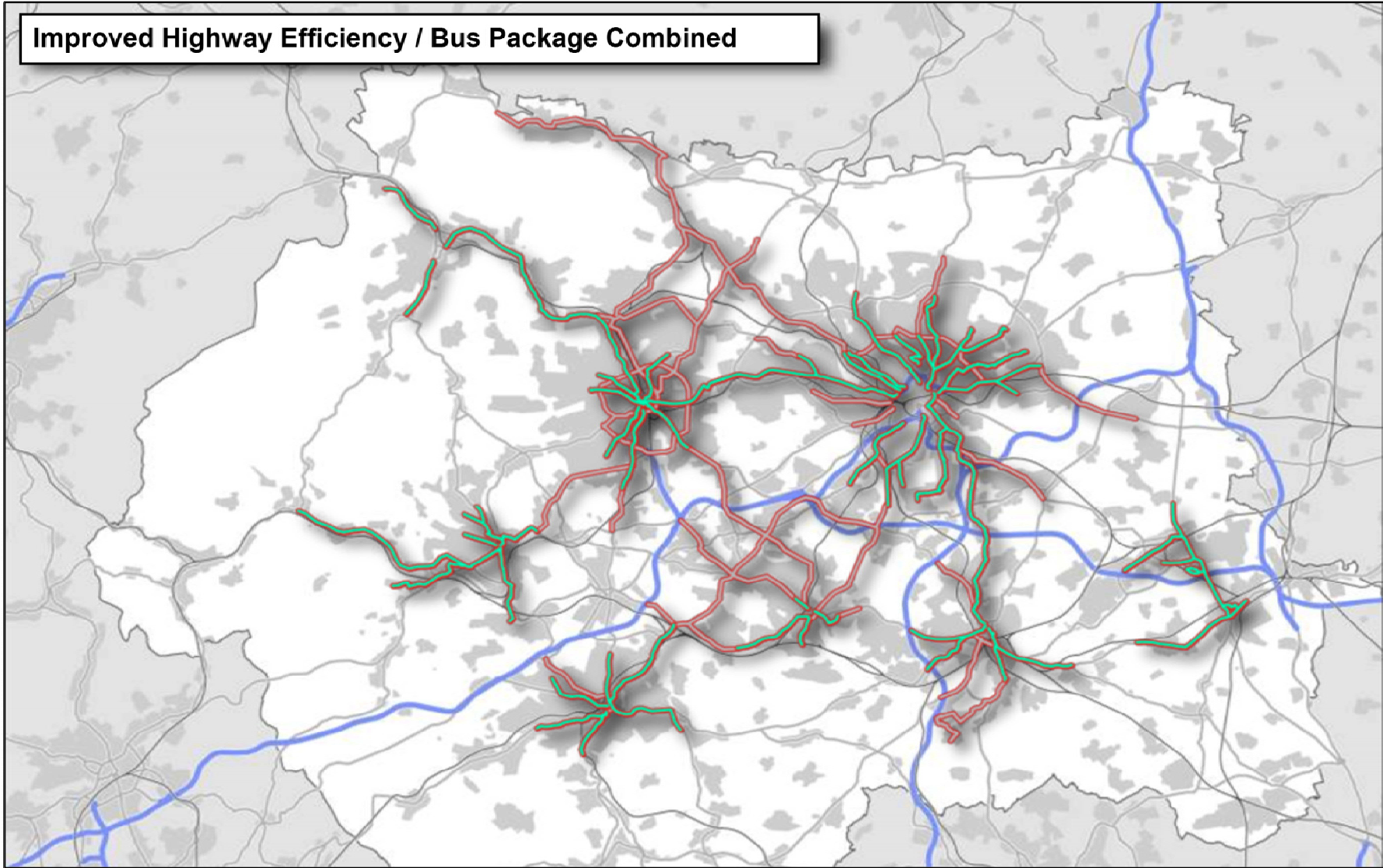
-  Motorway
-  A road
-  B road

-  Regional / National rail links
-  Local Rail Links
-  Station

-  District Boundary

# West Yorkshire Plus Transport Fund

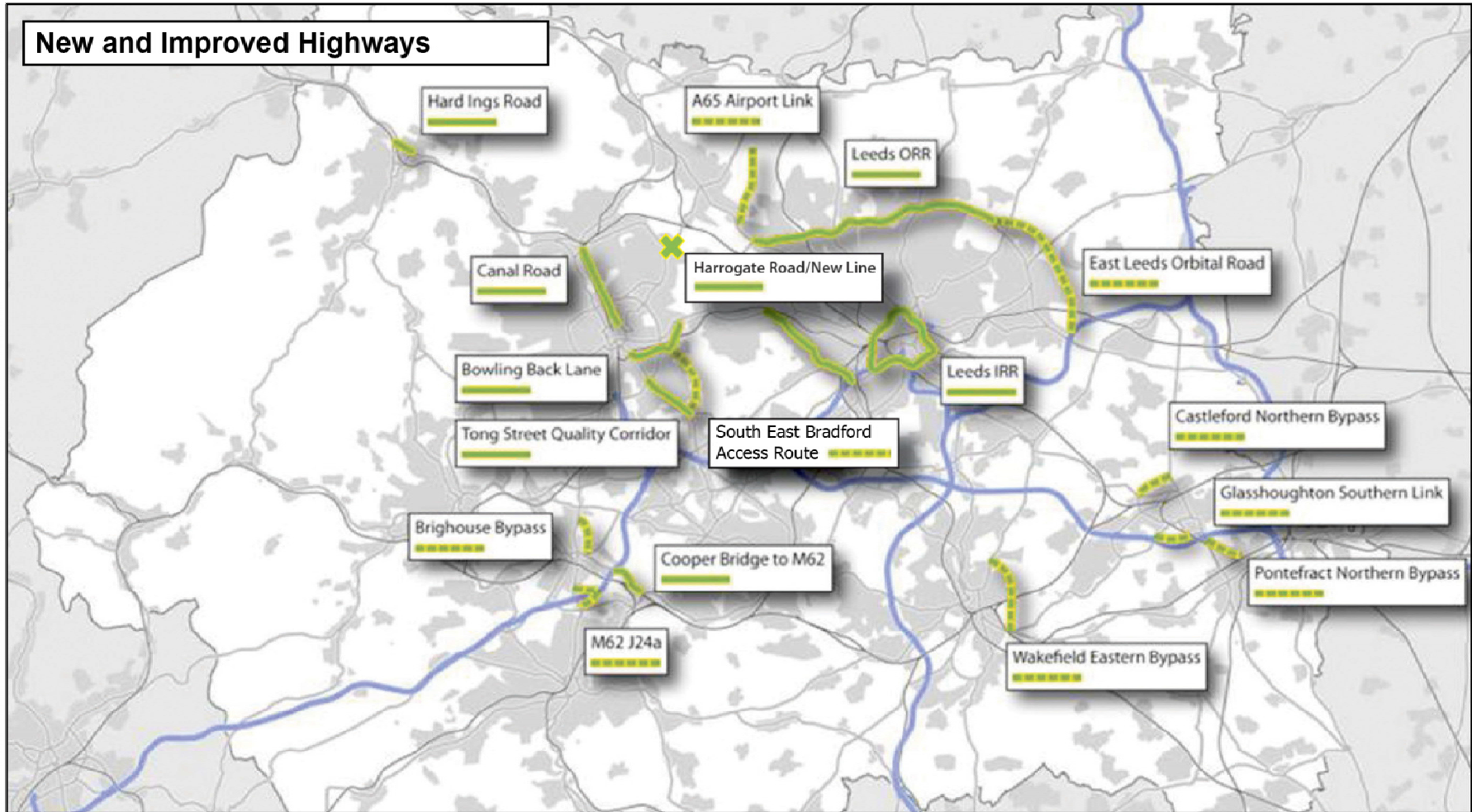
Improved Highway Efficiency / Bus Package Combined



## Key:

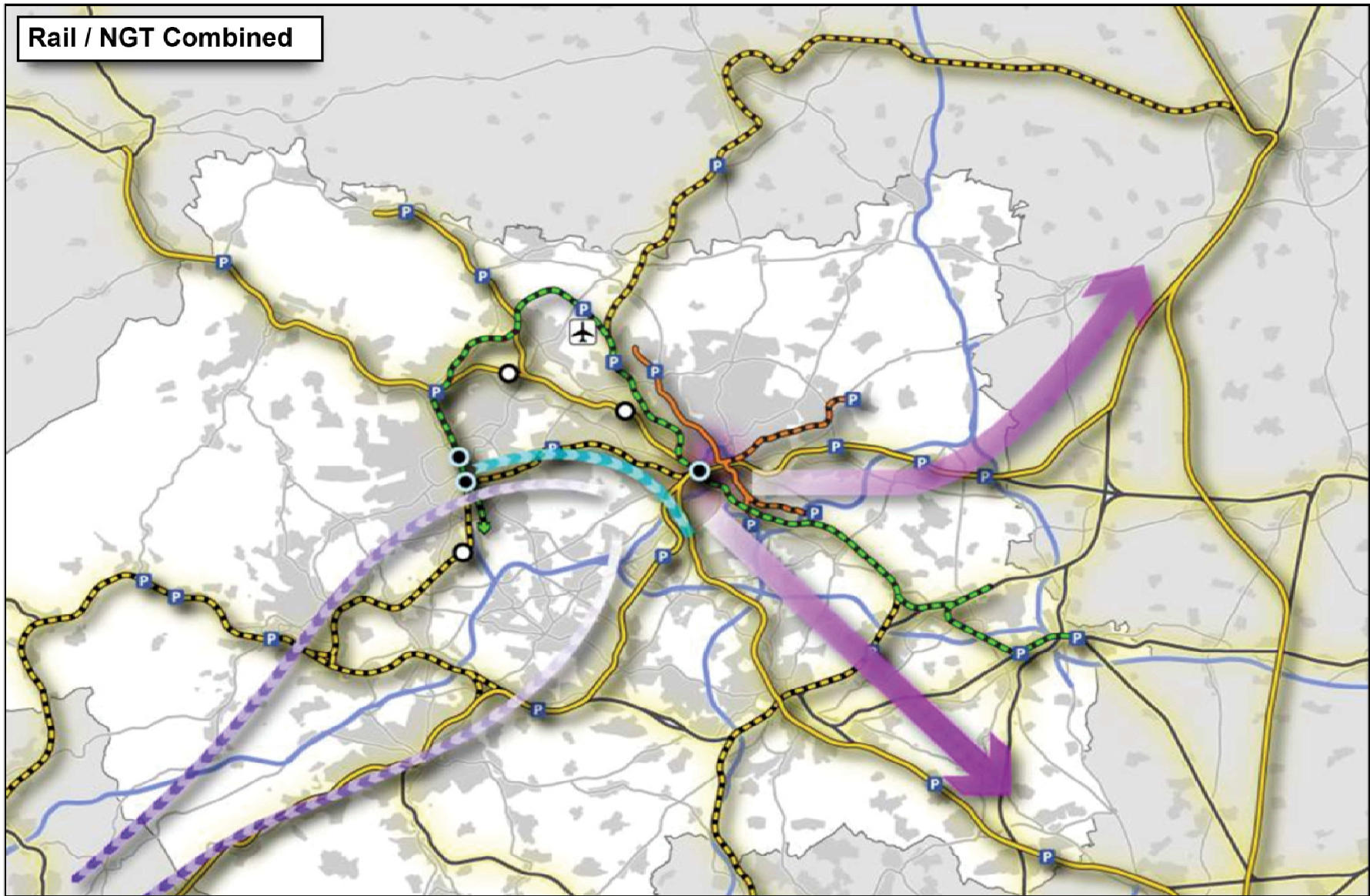
- West Yorkshire Core Road Network
- West Yorkshire Core Bus Network

# West Yorkshire Plus Transport Fund





# West Yorkshire Plus Transport Fund Proposals



## Key:

- Rail Electrification
- ↔ Improved rail links to East Coast Mainline
- ↔ Improved rail links to Manchester
- New Generation Transport

- New Tram Train Links
- Gateway station improvements
- ➔ Improved National Rail Links
- P Rail station car park improvements / Park & Ride

## **Appendix 2**

**Leeds City Region Statement of Cooperation (approved September 2014)**



## Statement of Cooperation for Local Planning

### Leeds City Region

Draft Final Report  
Leeds City Region Leaders Board  
1<sup>st</sup> July 2014

## Contents

1. Introduction	3
2. Legislation and Guidance	4
3. Leeds City Region Duty to Cooperate Process	7
4. Leeds City Region Strategic Cooperation	14
5. Strategic Issues (thematic)	19
6. Conclusion	25
Figure 1 Process diagram – identifying and addressing cross-boundary, strategic issues	11
Figure 2 Process diagram – Planning Portfolios Board and the Duty to Cooperate	13
Appendix A: Interim Strategy Statement	27
Appendix B: Leeds City Region Partner Development Plans’ Status	31
Appendix C: Duty to Cooperate Table Template	33
Appendix D: Leeds City Region Governance & Operational Groups	34
Appendix E: Draft Terms of Reference: Planning Portfolio Board	38
Appendix F: Leeds City Region Evidence Base	39
Appendix G: Leeds City Region Planning Charter	42
Appendix H: South Pennine Memorandum of Understanding	44

## 1. Introduction

- 1.1 The Duty to Cooperate became a statutory requirement on the 15<sup>th</sup> November 2011; it is a legal duty on Local Planning Authorities and certain public bodies<sup>1</sup> to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters.
- 1.2 The Leeds City Region is the functional economic area made up of the local authority districts of Barnsley, Bradford, Calderdale, Craven, Harrogate, Kirklees, Leeds, Selby, Wakefield, York and North Yorkshire County Council<sup>2</sup>. The Leeds City Region partnership of local authorities has a long history of collaboration on spatial planning and economic issues and has well-established partnership arrangements; formerly through the wider Yorkshire and Humber Regional Assembly partnership which informed the development of the Regional Spatial Strategy for Yorkshire and the Humber (RSS) and currently through the Leeds City Region Partnership (LCRP) which incorporates the Leeds City Region Enterprise Partnership.
- 1.3 Leeds City Region Planning Portfolios Board has prepared this Statement of Cooperation for Local Planning to outline the practical steps that are being taken to meet the Duty to Cooperate; the purpose of the Statement is twofold:
- To set out processes and practical steps to be followed going forward, that will strengthen the Leeds City Region authorities' approach to collaborative working;
  - To outline the current collaborative work on strategic, cross-boundary issues that is ongoing within the Leeds City Region.
- 1.4 This Statement of Cooperation sets out the legislation and guidance relating to the Duty to Cooperate. It outlines the Leeds City Region Duty to Cooperate process including best practice examples. The Statement also provides details of the current governance structures in place within the Leeds City Region to support collaborative working; it includes details of the Leeds

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<sup>1</sup> Environment Agency, English Heritage, Natural England, Civil Aviation Authority, Homes and Communities Agency, Clinical commissioning groups, National Health Service Commissioning Board, Office of Rail Regulation, Integrated Transport Authority, Highway authorities (including the Secretary of State).

<sup>2</sup> NYCC, the eleventh local authority, is a planning authority in respect of minerals and waste only, but also a strategic infrastructure provider in relation to the District Councils of Craven, Harrogate and Selby.

City Region strategic context and the current agreed priorities. It is proposed that this Statement be revised annually.

## **2. Legislation and Guidance**

- 2.1 The Localism Act (2011) and the National Planning Policy Framework requires local planning authorities specifically to cooperate with other planning authorities, public bodies and stakeholders on strategic matters affecting two or more planning areas.

### The Localism Act 2011

- 2.2 The key legislation governing the Duty to Cooperate is the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011. Section 33A of the 2004 Act requires local planning authorities to “.....engage constructively, actively and on an on-going basis.....” with other local planning authorities, County Councils and other prescribed public bodies when preparing development plan documents and other local development plan documents. The Duty to Cooperate also includes supporting activities, such as the preparation of the evidence base.
- 2.3 The Duty to Cooperate should be applied to any “*strategic matter*” related to the preparation of the document. A strategic matter is defined as “*sustainable development or use of land that has or would have a significant impact on at least 2 planning areas including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas*” (section 33A (4) (a)). The aim of such cooperation is to maximise the effectiveness of the documents.
- 2.4 In this regard local authorities and others are required to engage constructively, actively and on an ongoing basis. Regard must also be had, under section 33A (9) and regulation 4(2), to the activities of Local Enterprise Partnerships as they relate to the Local Plan and supporting activities. Local Enterprise Partnership means a body, designated by the Secretary of State, which is established for the purpose of creating or improving the conditions for economic growth in an area.

### The National Planning Policy Framework

- 2.5 Paragraphs 178-181 of the National Planning Policy Framework (NPPF) provide guidance on planning strategically across local boundaries. Paragraph 181 states that:

*“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are*

*submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development”.*

2.6 Section 33A (6) of the Act adds legal weight to this guidance, requiring the Council to consider whether to prepare agreements on joint approaches to strategic planning, including whether to prepare joint local development documents with neighbouring local planning authorities.

2.7 Paragraph 178 of the NPPF also states that “*public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities ...*” The NPPF (paragraph 156) states that such priorities should include strategic priorities to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

However the NPPF makes it clear that this list is not exhaustive.

#### National Planning Policy Guidance

2.8 On March 6<sup>th</sup> 2014 the Government published the National Planning Policy Guidance (NPPG); it is available at the following link: [National Planning Practice Guidance](#). NPPG replaces a number of older guidance notes and complements the National Planning Policy Framework (NPPF). With regard to the Duty to Cooperate, NPPG confirms that the duty is the responsibility of local planning authority councillors and officers; leading discussion, negotiation and action to ensure effective planning for strategic matters in their Local Plans. The guidance also reiterates that it is not a duty to agree but that every effort should be made to secure the necessary cooperation on strategic cross boundary matters before a Local Plan is

submitted for examination. Further guidance is also provided on circumstances where an authority will not cooperate.

Other Guidance Documents

2.9 As well as the PAS ‘Doing your Duty’ early practice paper (2013), other useful guidance documents include [‘A Simple Guide to Strategic Planning and the Duty to Cooperate’ \(2011\)](#) produced by the Planning Advisory Service and in [‘Transition to the Localism Act and the NPPF’ \(2012\)](#) produced by the Planning Officers Society. The processes described in this Statement make reference to the guidance, including directly addressing the following key messages from the PAS guidance.

<b>PAS Guidance</b>	<b>Leeds City Region Enterprise Partnership Approach</b>
Utilise existing mechanisms / governance structures if they are useful vehicles which will help demonstrate cooperation.	Use of Heads of Planning and Planning Portfolios Board within the context of the wider Leeds City Region Enterprise Partnership Structure in addition to joint working with neighbouring authorities.
For key strategic issues, look to produce joint evidence with neighbouring authorities and / or prescribed bodies	Examples of joint evidence include the Kirklees, Wakefield and Calderdale Joint Strategic Flood Risk Assessment (see p21).
Keep good and easily accessible (transparent) records of your engagement with neighbouring authorities and prescribed bodies so that it is easy to demonstrate cooperation.	Tools to demonstrate cooperation, to be used as appropriate, include the Duty to Cooperate Table, Duty to Cooperate Statements, Statements of Common Ground and Memorandums of Understanding (MoU).
The responsibility to respond to the Duty is not confined to Examination and cannot be ‘retro-fitted’. It necessitates co-ordination and cooperation throughout all stages of plan preparation, planning for strategic projects and on to delivery and implementation.	Joint-working on strategic, cross-boundary issues will be undertaken throughout the development plan preparation process from early engagement through to consultation on draft plans. Planning Portfolios will be consulted at the draft plan stage (see Figures 1 and 2).



### 3 Leeds City Region Duty to Cooperate Process

- 3.1 The introduction of the Duty to Cooperate was an important change to the methodology of preparing Local Plans, it requires more than consultation with adjacent Councils; it requires cooperation in the preparation of plans and in the way in which plan provisions are arrived at in order to ensure that sustainable strategies are adopted and strategic issues are properly addressed; it is outcome focussed. The National Planning Policy Framework (NPPF) makes clear that cooperation should be a continuous process of engagement from initial thinking through to implementation. NPPG states that *“LPAs should bear in mind that effective cooperation is likely to require sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone”*. In determining whether the Duty to Cooperate has been fulfilled it is necessary to consider both the process that has been gone through and the outcomes. The objective is effective plan-making that recognises and responds effectively to matters identified in evidence that have implications both within and beyond the Plan area.
- 3.2 Since it became a statutory requirement on 15th November 2011, the Duty to Cooperate has been tested through the examination of a number of Core Strategies and Local Plans nationally which have now progressed through to adoption; for examples of early practice on the Duty to Cooperate PAS has produced a guide which is available at the following [link](#). For information on the status of Core Strategies and Local Plans within the Leeds City Region refer to Appendix B.
- 3.3 There is no definitive list of actions that constitute effective cooperation under the Duty to Cooperate as the actions will depend on local needs. NPPG states that, *“Cooperation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty.”* The issues that authorities choose to cooperate on and the method by which cooperation is undertaken is therefore at the discretion of the Local Planning Authority. This section of the Statement provides some high level principles on how Leeds City Region planning authorities intend to cooperate on strategic, cross-boundary issues and considers some of the options for documenting the process. All authorities will find methods of cooperation and documentation that are appropriate to their local circumstances.
- 3.4 Cooperation at different levels will be required (city region, county and district), the level at which engagement is required will be determined by the strategic issues identified. Local planning authorities are likely to be required to work in different groupings for different

strategic matters. Section 33A(6) of the 2004 Act requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Local planning authorities are also required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

#### High Level Principles

3.5 The Leeds City Region authorities have identified the following high level principles that will influence a joint approach to meeting the Duty to Cooperate:

- **Cooperation throughout the development plan process:** the Duty to Cooperate is a statutory requirement for Local Plan preparation, implementation, ongoing monitoring and review; the Duty to Cooperate therefore applies throughout the development planning process.
- **Going beyond consultation:** effective cooperation requires sustained joint working, identifying actions and achieving outcomes. Correspondence, conversations and consultations alone are not sufficient.
- **Taking a pragmatic approach:** not all issues will require cross-boundary cooperation and the scale at which cooperation needs to take place to achieve the most effective outcomes will be dependent on the nature of the strategic matter.
- **Responding to all requests to engage:** at a local level where planning authorities within the Leeds City Region partnership request input into their development plan process a response will be provided from other authorities in the partnership. It is acknowledged that a 'no comment' response is more valuable than no response.

#### Identifying and Addressing Strategic, Cross boundary Issues (officer led)

3.6 Figure 1 below captures key stages that planning authorities may go through to identify and address cross-boundary, strategic issues in preparing development plan documents. The diagram represents an outline example, intended to be used as a guide only, as the nature of collaboration will depend on the circumstances of the authority.

3.7 The process diagram illustrates that collaboration needs to be undertaken throughout the development plan process, it is important not to confine cooperation to any one point in the process. It also identifies that engagement in the early stages is essential in identifying the strategic cross-boundary issues. The activities that fall within the Duty to Cooperate include activities that prepare the way for or support the preparation of Local Plans this might involve

joint research and evidence gathering to define the scope of the Local Plan, assess policy impacts and assemble the necessary material to support policy choices. The diagram identifies a series of actions that may be appropriate at different stages of plan preparation and for each stage possible methods of documenting collaborative working are identified.

- 3.8 It is important to note that the diagram only represents the collaboration through the plan making period, monitoring and reviewing progress on cross-boundary, strategic issues will be an on-going process beyond adoption of local development plans and throughout the policy implementation period.

#### Duty to Cooperate Tools

- 3.9 The list of strategic priorities included in NPPF is not exhaustive; it is therefore at the discretion of the Local Planning Authority to determine which issues they consider to have cross-boundary, strategic implications. The Leeds City Region planning authorities have developed a Duty to Cooperate Table (template) to be used as a tool in identifying strategic, cross-boundary issues and in addressing these issues; the template includes a list of policy areas where cross-boundary issue are most likely to arise. The recommendation is that all of these policy areas are considered, in addition to any additional local priorities identified. The table can be used as a tool to assist with high-level scoping of strategic, cross-boundary issues, for the collation of responses when engaging stakeholders and to track issues throughout the plan preparation process; the tables are therefore live until the point of final submission of the development plan.
- 3.10 This template was endorsed by the Leeds City Region Leaders' Board on the 6<sup>th</sup> December 2012. A copy of this template is included as Appendix C; the template has been used by Leeds City Council, Wakefield Council, Selby Council and Kirklees Council and has been adapted by each planning authority to meet local needs.
- 3.11 Documentation of the actions undertaken to fulfil the Duty to Cooperate is essential as local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. NNPG states that authorities should submit robust evidence and that this could be in the form of a statement submitted to the examination. Evidence should include details about who the authority has cooperated with, the nature and timing of cooperation and how it has influenced the Local Plan.

3.12 Also included in Figure 1 as examples of documenting collaboration are Statements of Common Ground and Memorandums of Understanding (MoU). An example MoU is provided as Appendix H; the example is a framework for cooperation between South Pennine local authorities (including Kirklees, Calderdale and Barnsley within the Leeds City Region) with respect to strategic planning and development issues relating to renewable energy, in particular wind energy.<sup>3</sup> The MoU provides a good example of joint working to cover a strategic issue dominated by the geography of the landscape rather than administrative boundaries. Authorities also report on on-going Duty to Cooperate compliance in their Annual Monitoring Reports.

**Application of the Duty to Cooperate in the Leeds City Region**

**Wakefield Council: Site Allocations Document Preparation**

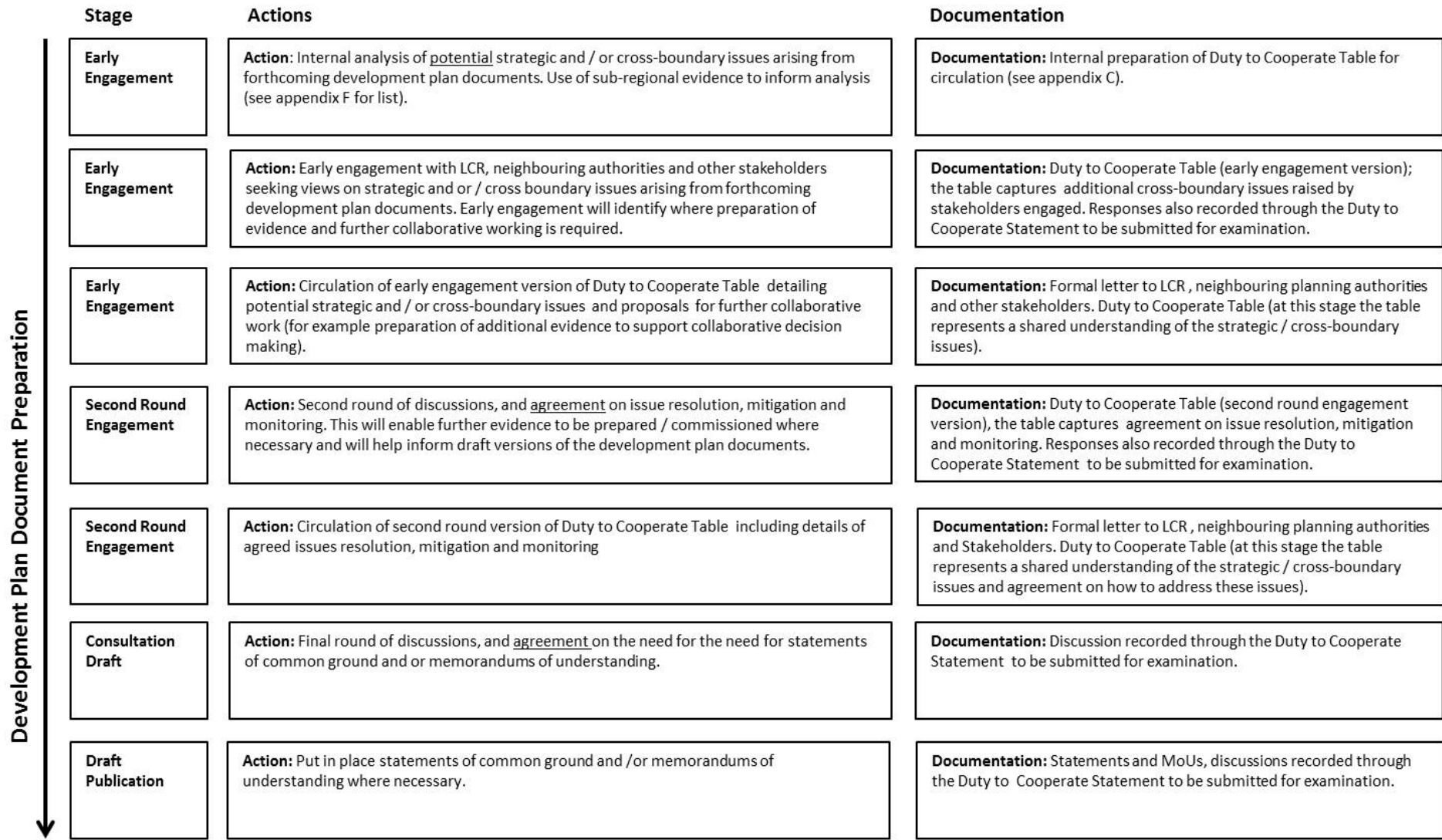
It was predicted at an early stage that there might be significant cumulative impacts on the strategic road network from the development of sites. Consultation with the Highways Agency on their preferred options indicated particular pressures on the motorway junctions along the M62. A joined up approach was agreed to model the potential impacts on the strategic road network using Wakefield's site allocations data and assumed growth from early versions of adjoining authorities' Core Strategies. This modelling indicated pressure on some motorway junctions which would need significant mitigation measures – the delivery and timing of which might represent essential infrastructure if growth in Wakefield was to be realised.

Further modelling on more refined options at a later stage of the Plan allowed the Council to take on board the issues evidenced by the modelling and also allowed the Highway Agency to consider their position in determining their priorities for improvements to the motorway junctions to increase capacity. The end result was an agreed position of impact, demonstrated by robust evidence, which led to agreed mitigation measures. These measures were then written into Wakefield's Development Plan and the Highways Agency were able to confirm that their document was sound.

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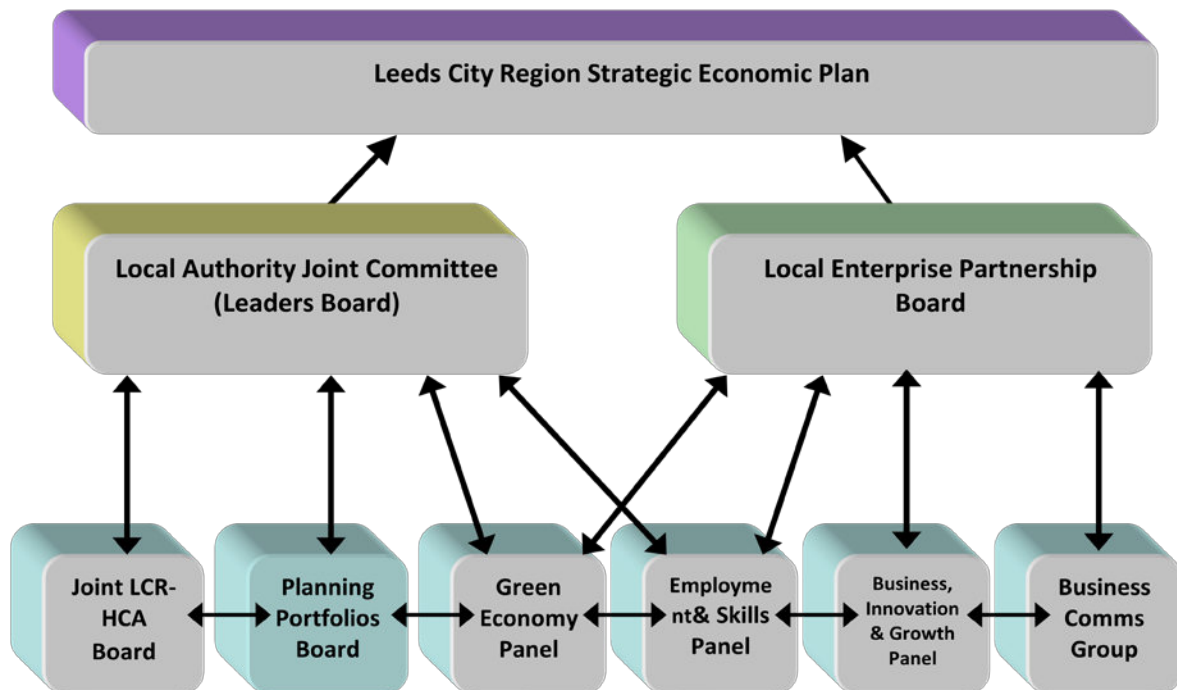
<sup>3</sup> The MoU has been signed by the following authorities: Barnsley, Burnley, Bury, Calderdale, High Peak, Hyndburn, Kirklees, Lancashire CC, Pendle, Rochdale and Rossendale.

Figure 1: Process Diagram - Identifying and addressing cross-boundary, strategic issues



Political Oversight and Endorsement of Duty to Cooperate Outcomes (member led)

3.12 The Planning Portfolios Board is one of a series of panels and boards within the Leeds City Region structure, a diagram of the full structure and descriptions of the function of the boards and panels is provided at Appendix D. The Planning Portfolios Board has Councillor representation from each Local Planning Authority (and Senior Officer support). It was established specifically to provide political oversight on strategic planning matters<sup>4</sup> and the Duty to Cooperate, advising the Leeds City Region Leaders Board and Leeds City Region Enterprise Board on appropriate actions that could / should be taken in respect of these planning matters. The Board is tasked with providing political oversight for matters relating to the Partnership's role in supporting authorities in ensuring compliance with the legal requirements of the Duty to Cooperate. Appendix E provides the full Terms of Reference for the Planning Portfolios Board.



3.13 Collaboration on planning matters is currently supported at three specific levels through the following key groups:

- Leeds City Region Planning Portfolios Board (Members and Chief Officers)

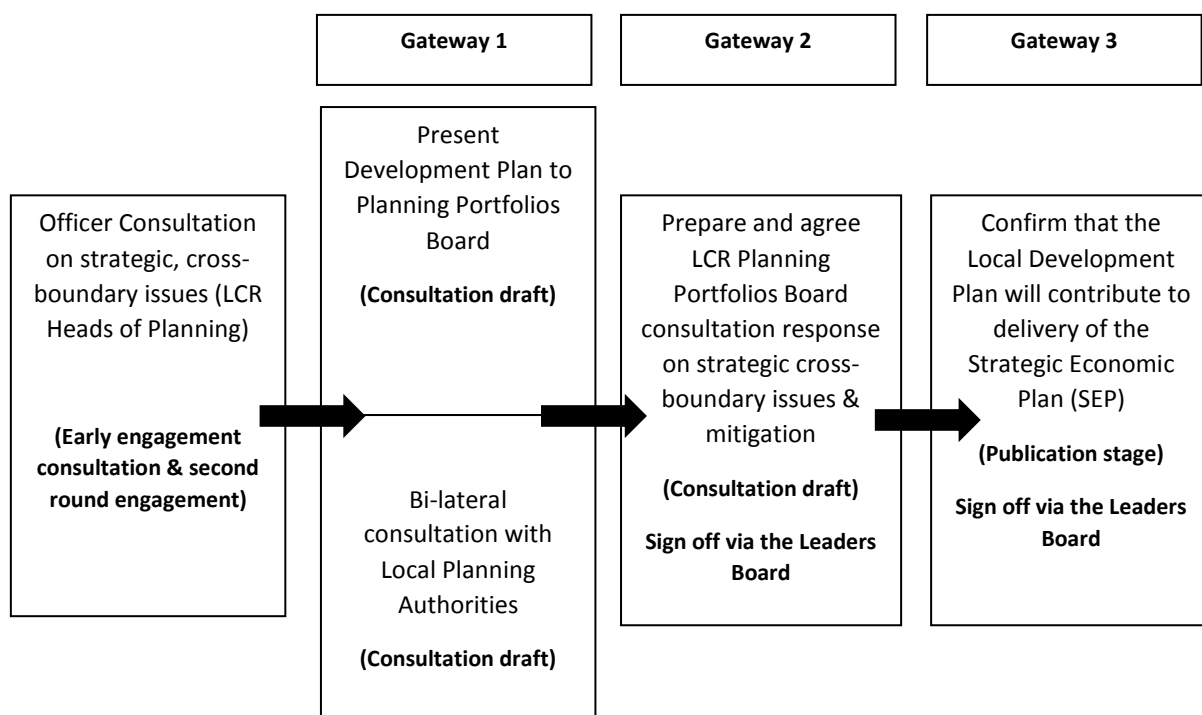
<sup>4</sup> Strategic Planning is defined as ‘sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas’ (Localism Act, 2011).

- Leeds City Region Heads of Planning (Chief Officer Level)
- Strategic Planning (DTC) Group (Local Plan Lead Officer Level)

Leeds City Region spatial planning matters are also reported to the Leeds City Region Directors of Development Group and Leeds City Region Chief Executives’ Group as required.

3.14 As the core function of the Portfolios Board is to provide political oversight on strategic planning matters the Board is well-positioned to advise on strategic, cross-boundary issues within local development plans. The Planning Portfolios Board was established November 2013 and a number of development plans have been presented to the Board for discussion. It is proposed that these arrangements are formalised and that all Leeds City Region authorities will formally consult the Planning Portfolios Board at draft plan stage.

**Figure 2: Process Diagram – Planning Portfolios Board and the Duty to Cooperate**



3.15 The diagram above illustrates the process; including both officer and member engagement and ensures that Leeds City Region level engagement is complementary to bi-lateral engagement. The three Gateways in the diagram above include those stages that involve input from the Planning Portfolios Board only, as illustrated in the process diagram Figure 1 collaborative working on cross-boundary issues will also be required at the early engagement and options stages of plan preparation. For context, Appendix B provides a summary of

current progress on plan making at the district level, indicating when authorities expect to be at the Examination stage for individual plans.

## **4 Leeds City Region Strategic Cooperation**

- 4.1 The sub-regional partnership arrangements have an important role to play in supporting Local Planning Authorities in meeting the Duty to Cooperate. Planning authorities are required to engage in a co-ordinated process for securing sustainable development and resolving strategic issues, the Leeds City Region structures and activities support this process.
- 4.2 It is important to note however that the Leeds City Region Enterprise Partnership (LEP) currently has no statutory basis for decision making within the planning system. A recent [RTPI research paper](#) explores the current functional relationships between local planning authorities and LEPs on a national basis and provides useful context.

### Rationale for Strategic Cooperation

- 4.3 There is a history of collaboration on spatial planning issues across the city region particularly since 2004 when work began on the Regional Spatial Strategy (RSS) for Yorkshire and Humber; the Yorkshire and Humber Plan was adopted in 2008. Following the revocation of the RSS collaboration has continued between authorities on strategic planning in part to meet the requirements of the Duty to Cooperate, but more practically because collaboration is considered locally to be good practice and to result in better planning and planning outcomes. Leeds City Region level collaboration is undertaken for a number of reasons:
- The main functional trends and drivers for change that affect places operate at a spatial scale above local authority level. Housing markets, commercial property markets, labour markets, business agglomeration effects and supply chains, travel to work areas, utilities networks and water catchments for example do not stop at local authority boundaries. In the context of the Duty to Cooperate, understanding these greater-than-local trends and engaging with partners to identify and resolve issues is essential.
  - There is a collective interest across local authorities in the success of the most important places of growth, regeneration and change that will drive the city region's economy. Local policy development cannot be undertaken in isolation, authorities within the Leeds City Region are actively engaged in identifying and promoting / delivering strategic priorities.
  - There is a clear value in using strategic spatial analysis to develop a policy framework that will support the process for the prioritisation and integration of investment in places across



different funding streams and policy areas addressing the strategic aspects of what the Local Government Association has described as 'place based budgeting'. This will be particularly important in the context of significant reductions in funding over the next 3-5 years and as the City Region Enterprise Partnership continues to more effectively join up its investment priorities across economic development, skills, innovation, transport and housing.

- Finally, planning policy at the district level relies to some extent on an evidence base and technical work developed across local authority boundaries because the matters being considered have cross boundary implications. Examples of this include economic forecasts, population and household projections, renewable energy, waste and minerals. Some of these areas of technical work for example minerals and renewable energy will benefit from technical work based on a geography that is wider than the city region. The preparation of joint plans and evidence is an integral part of meeting the Duty to Cooperate.

#### The Leeds City Region Interim Strategy Statement

4.4 Following the revocation of the RSS the Leeds City Region authorities produced an Interim Strategy Statement. The purpose of the 2011 Statement was to provide an interim strategic context for both plan making and major development proposals. The Statement (2011) set out that *'the authorities in the partnership continue to support the broad policy thrust of the former RSS and the principles of urban transformation contained in the Plan' [The Yorkshire and Humber Plan, 2008]*. The Statement identifies a list of policies that authorities propose to adhere to from the approved RSS to ensure that the above principles were retained. The full Interim Strategy Statement is provided at Appendix A including the list of policies. The Statement was endorsed at the Leeds City Region Leaders Board meeting on Thursday 21<sup>st</sup> April 2011.

4.5 A review of the Strategy Statement has been included in 2014/15 Planning Portfolio Board work programme and is scheduled for autumn 2014.

#### The Leeds City Region Planning Charter and Consultation on Major Applications

4.6 In addition to collaboration on plan making the Leeds City Region is also working together to ensure that the city region has a business friendly planning system. The Leeds City Region Local Enterprise Partnership has developed a charter which sets out how the Local Planning Authorities and developers will work together to ensure that proposals major new investments will be dealt with in an efficient and effective way throughout the city region. The

Charter represents the first step towards creating a seamless service for investors wherever they choose to locate in the city region. A copy of the Charter is included at Appendix G.

- 4.7 Consideration is also being given to whether the LEP Board should be consulted on major planning applications (where these are considered to be of strategic importance and or have potential cross-boundary implications). The Board would consider whether major proposed developments will achieve the ambitions of the Leeds City Region Strategic Economic Plan (SEP).

**Application of the Duty to Cooperate in the Leeds City Region  
Leeds City Region: DtC Officer Group**

The Duty to Cooperate Officers Group was originally convened in 2012 to enable an opportunity for planning issues to be raised at an early stage that may have cross boundary implications. Authorities are encouraged to liaise and share information in the meetings but also outside the formal meetings as well. These have continued to be a regular and ongoing series of meetings with agendas prepared and agreed in advance. The meetings are formally minuted and are timed to coincide with Leeds City Region Heads of Planning meetings and Leeds City Region Leaders Board and more recently Leeds City Region Planning Portfolio Board meetings, in order to enable matters to be escalated at the appropriate time if required.

The meetings provide an opportunity for joint authority working on specific evidence – through topics being raised at an early stage and the scope of the work to be undertaken. Through this process Leeds City Council for example, has been able to demonstrate compliance with the DtC legal requirement. As part of the Council's evidence submitted for Core Strategy Examination, the City Council submitted a DtC background paper. This included a matrix schedule encapsulating comments received on the plan and the mitigation put in place. This provided a basis for comparison with the earlier DtC material presented at Pre-submission stage, documenting the influence on the DtC process through the changes subsequently presented.

## Strategic Context and Agreed Priorities

- 4.8 NPPG states that Local Enterprise Partnerships have a key role to play in delivering local growth by directing strategic regeneration funds and in providing economic leadership through their Strategic Economic Plans. The commitment of local planning authorities to work collaboratively with Local Enterprise Partnerships across their area is therefore considered to be vital for the successful delivery of policies for strategic growth in Local Plans. An effective policy framework for strategic planning matters, including joint or aligned planning policies, is a fundamental requirement for this.
- 4.9 As detailed in Section 2 of this Statement, Planning Authorities must have regard to the activities of the LEP; *“in meeting the Duty regard must be had to the activities of Local Enterprise Partnerships as they relate to the Local Plan and supporting activities”*. This requirement reflects the important role that both Local Enterprise Partnerships and Local Nature Partnerships need to play in strategic planning. NPPG states that: *Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making.*
- 4.10 The following is a summary of the Leeds City Region Enterprise Partnership policy framework.

### The LEP Vision

The LEP’s new vision for the Leeds City Region is:

*‘To unlock the City Region’s immense potential, becoming the growth engine for the North and the Nation.’*

### The LEP Plan

The LEP Plan set out in 2011 the Leeds City Region’s original ambitions and strategy and policy framework to grow the economy. It identified four strategic investment priorities, as listed below. These have recently been updated as part of the development of the Leeds City Region Strategic Economic Plan, which was submitted to Government in March 2014.

1. Unlocking the growth potential of businesses in key economic sectors;
2. Making the most of a skilled and flexible workforce;
3. A Resource Smart City region; and
4. Creating the environment for growth: major centres, housing and transport.

## The Leeds City Region Strategic Economic Plan (SEP)

The Leeds City Region Strategic Economic Plan was influenced by emerging local development plan strategies and priorities. The Strategic Economic Plan updated the four LEP plan investment priorities (now referred to as the four strategic pillars):

1. Supporting growing businesses;
2. Developing a skilled and flexible workforce;
3. Building a resource smart city region;
4. Delivering the infrastructure for growth;

The Strategic Economic Plan also sets out complementary strategic targets to be achieved by 2021:

1. £5.2bn additional economic output beyond current projections
2. 62,000 extra jobs
3. £675m in benefits savings
4. Making the City Region a net contributor to the national economy

4.11 Priority 4 of the Leeds City Region Enterprise Partnership Plan and Strategic Economic Plan: Delivering the infrastructure for growth, provides the main context for collaborative work on spatial planning within the Leeds City Region. The long term ambition is: *“To build a 21st Century physical and digital infrastructure that enables us to reach our growth potential.”* The following key action areas are identified in the Plan:

- Ensure that **transport connectivity** provides the engine for growth by implementing our delivery plan from 2015-16. This includes:
  - **West Yorkshire plus Transport Fund** – 32 prioritised schemes delivered over 10 years to increase employment opportunities and economic growth, creating 20,000 jobs and increasing economic output by £2.4bn each year;
  - **DfT legacy schemes** – three ongoing major schemes: New Generation Transport, Leeds Inner Ring Road and Leeds Rail Growth Package for 2015-16 and beyond;
  - **Accelerated Growth programmes** – quickwin transport interventions targeted at strategic growth areas and network connectivity enhancements to generate additional GVA and jobs, and prepare the Leeds City Region to be HS2-ready;
- **Double house-building** particularly in strategic housing and employment growth areas, and deliver new affordable homes;

- **Bring forward development sites** that commercial investors will not currently finance through site decontamination, clearance and other upfront infrastructure works;
- **Deliver improvements to digital and green infrastructure** to accelerate further growth and investment.

## 5 Strategic Issues (thematic)

5.1 As recommended in the Interim Strategy Statement further work is being undertaken at a city region level to establish joint positions on spatial planning issues as a strategic context for emerging Local Plans. Both the strategies and plans being taken forward in the city region, as well as the research and analysis on a city-region-wide scale will provide a robust strategic framework upon which local planning authorities can draw in the preparation of local plans; an overview of work (complete and proposed) is provided below by theme. Also included are examples of policy implementation on cross-boundary strategic issues such as transport and broadband. A number of case study examples demonstrating collaborative working are also included.

### Transport Infrastructure

5.2 The Leeds City Region has a strong history of collaboration on transport priorities; the following is a summary of the current partnership priorities and programmes:

- There are a number of strategic plans and programmes that set out transport's contribution to the economic well-being of the Leeds City Region, as well as impacts on the environment and people's quality of life. These plans and programmes include:
  - Strategic Economic Plan (SEP);
  - Leeds City Region Transport Strategy;
  - Local Transport Plans (the statutory plans for transport in West Yorkshire, York, North Yorkshire and South Yorkshire);
  - West Yorkshire plus York Transport Fund.
- The Leeds City Region Local Enterprise Partnership has developed an ambitious transport proposition to substantially increase transport investment in the area to promote economic growth, this is set out in the Strategic Economic Plan.
- The Leeds City Region Transport Strategy was developed in 2009 and sets out a framework for a period of 20-25 years. It aims to improve transport across the area by meeting

existing demand for travel, tackling current problems of congestion, supporting future development and prosperity, and progressing towards a lower carbon economy.

- The West Yorkshire Combined Authority is the Local Transport Authority (LTA) for West Yorkshire, City of York Council is the LTA for York, Barnsley falls within the South Yorkshire Transport Authority area and Selby, Craven and Harrogate within the North Yorkshire Transport Authority area.
- For West Yorkshire, the third Local Transport Plan (2011-26) was developed through extensive public and stakeholder engagement by the Integrated Transport Authority, working with the five constituent District Councils. The 15 year Plan was adopted by all the partners in March 2011.
- There have been significant developments since the West Yorkshire LTP 2011 – 2026 was adopted in 2011. The most significant of these are:
  - The establishment of the WYCA on 1 April 2014;
  - West Yorkshire plus York Transport Fund 2014-24 – a £1.6bn programme of transport interventions;
  - The development of the Strategic Economic Plan 2015-21 as a bid to the Local Growth Fund. IP2 will need to be reviewed following the outcome of the Strategic Economic Plan bid in July 2014;
  - Development of High Speed 2 proposals and the need to ensure that benefits are spread across the wider city region area.
- It is proposed that, in view of these developments, a review is undertaken in West Yorkshire to develop a single transport plan for the West Yorkshire Combined Authority that sets a clear strategy and context for future interventions. In any future review, a single transport plan could also include City of York Council. It could be interpreted from the legislation (Localism Act, 2011) that the West Yorkshire Combined Authority has to comply with the Duty to Cooperate. The West Yorkshire Combined Authority will explore how this will be achieved for new documents and strategies and is currently working in partnership with the Leeds City Region Enterprise Partnership to ensure that the processes for meeting the Duty to Cooperate are aligned.
- Through the West Yorkshire plus York Transport Fund, West Yorkshire partners, with City of York Council, have developed an ambitious plan to create 22,000 jobs and economic growth across the area. The West Yorkshire plus Transport Fund is a 10 year investment plan worth £1.6bn to deliver a priority core programme of transport interventions, specifically targeted at creating new jobs and unlocking growth.

## Housing

- 5.3 Meeting housing needs is one of the most important functions of Local Plans. Failure to deal with it properly can have wide-ranging implications for the whole plan and can render the whole document unsound, this is a key issue for constituent Local Planning Authorities in the Leeds City Region who are seeking to progress their local plans to significantly boost housing supply to meet needs and support economic growth.
- 5.4 The NPPF requires that Councils should positively seek opportunities to meet the development needs of their area and that Local Plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. It states that every effort should be made objectively to identify and then meet housing needs, setting out a clear strategy for allocating sufficient land, taking account of the needs of the residential community. It is clear from national guidance that the Government places considerable importance on the need to encourage house-building to meet the national shortage<sup>5</sup>.
- 5.5 In this context the following work is underway in Leeds City Region to both support LEP work as well as provide LPAs with up-to-date evidence for their local plan preparation:
- An updated Leeds City Region Housing and Regeneration Plan was commissioned in late 2013 to inform the Leeds City Region Strategic Economic Plan submission and update the housing and regeneration context and policy and investment priorities. A final document will be completed in Summer 2014.
  - Research has been commissioned to strengthen the Leeds City Region evidence base on housing affordability. This work will inform ongoing work with the Homes and Communities Agency on the next Affordable Housing Programme (2014-17). The research sets out what affordability means in the city region in relation to a variety of income levels in different locations and provide an understanding of the strategic affordability needs and potential interventions required to meet these needs.
  - Two key pieces of work were commissioned in the latter part of 2013 to support the work of individual authorities on planning for housing specifically and to help in addressing the requirements of the Duty to Cooperate. The first addressed a common methodology for defining the objectively assessed need for housing and the second considered cross-boundary implications of housing markets. Both of these pieces of work will be

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<sup>5</sup> Extract from the Letter from the Planning Inspectorate to Kirklees Council, 26<sup>th</sup> April 2013.

completed in Summer 2014 and will provide a joint evidence base for the Leeds City Region and each LPA.

**Application of the Duty to Cooperate in the Leeds City Region**

**Kirklees, Wakefield & Calderdale Councils: Joint Strategic Flood Risk Assessment**

Wakefield's Core Strategy or Sites Allocation documents both needed to be informed by a robust assessment of flood risk, particularly as it this was needed to inform whether Wakefield was able to deliver strategic levels of growth or not. The major river catchment for Wakefield which could potentially prevent growth is the River Calder, and recognising the wider catchment of the river, work was commissioned alongside Kirklees and Calderdale Councils on a joint Strategic Flood Risk Assessment. The preparation of this closely involved the Environment Agency and the findings of the study were able to be agreed between all parties.

Wakefield Council used this data in their site selection process to avoid as far as possible development within the areas of highest probability of flooding. A positive outcome of this joint working was reflected in that consequently, little or no objections were raised to the Wakefield's Core Strategy or Sites Allocation documents on flood risk grounds.

Waste and Minerals

- 5.6 Advice and guidance produced by the Government seeks to move towards enhanced working between local authorities on areas of common interest to achieve sustainable development. The nature of minerals and waste developments mean that often there are implications beyond individual planning authorities' boundaries. Each of the unitary Local Authorities in the region is a Minerals and Waste Planning Authority. In addition, as minerals and waste planning authorities, North Yorkshire County Council, the City of York Council and the North York Moors National Park Authority are producing a minerals and waste joint plan. The minerals and waste joint plan will, once finalised, set out new planning policies for minerals and waste developments across all three areas which will guide decisions on planning applications up to 2030. It is estimated that the plan will be adopted October 2015.



- 5.7 North Yorkshire County Council recently produced the first draft of a position statement on waste, covering the Yorkshire and Humber area, following a meeting of Yorkshire and Humber waste planning officers in April 2014.
- 5.8 The NPPF also requires every mineral planning authority to carry out a Local Aggregate Assessment each year. This is a new obligation and comes on top of the need to establish a (regional) Aggregates Working party and carry out annual monitoring of the production and supply of aggregates. A draft West Yorkshire Local Aggregates Assessment has been prepared and is currently being finalised in consultation with neighbouring Mineral Planning Authorities. This will help inform the consideration of further collaborative work on minerals and waste planning across West Yorkshire, including in relation updating local planning policy.
- 5.9 A Local Aggregate Assessment for the North Yorkshire Sub-region was also finalised and submitted to the (regional) Aggregates Working Party in May 2014. The LAA was prepared by North Yorkshire County Council, the City of York Council, the Yorkshire Dales National Park Authority, and the North York Moors National Park Authority.

#### Broadband

- 5.10 The Leeds City Region Digital Infrastructure Plan was published in 2012 and due to the economic, social and environmental importance of enhancing digital infrastructure and broadband coverage, steps have been taken to ensure that local planning policy and decision making takes into account the priorities of the Leeds City Region Digital Infrastructure Plan. The following are current key programmes within the Leeds City Region:
- Superfast West Yorkshire Programme – BT have been commissioned to deliver a £22m broadband fibre infrastructure enhancement programme in West Yorkshire (excluding Kirklees), to deliver superfast broadband accessibility coverage to 97% of the area by September 2015. Not only will this project provide superfast broadband to 59,000 additional homes, an associated business support programme will maximise the economic impact of the investment by working with up to 2,000 companies to exploit the benefits.
  - Superfast North Yorkshire Programme – BT have been commissioned in York and North Yorkshire to similarly deliver an enhanced fibre infrastructure programme. The programme is forecast to achieve 90% coverage across the area by the end of 2014, and there is also a similar business support programme to support SMEs to exploit the enhanced broadband opportunities.

- Enhancements in broadband infrastructure in Barnsley is being taken forward in collaboration with the South Yorkshire authorities.
- SuperConnected Cities Programmes in both Leeds/Bradford and also in York. Connection vouchers worth up to £3,000 are available to SME businesses to cover the cost of upgrading to a superfast broadband connection. Investments have also focused on rolling out further activities including wireless networking within the city centres, libraries and other public buildings and free Wifi on major bus and train routes.

5.11 Leeds City Region partners are working to ensure that planning and highways departments in all of Leeds City Region's authorities are well linked with broadband programmes so that they have early sight of all roll-out plans. In West Yorkshire for example, regular and ongoing joint meetings take place between the Superfast Broadband team, BT and local authority planning and highways officers to ensure the smooth roll-out of the programme through jointly planning streetwork management within and across local authority boundaries and a number of practical measures are being taken:

- Ensuring that through both the planning policy and development management processes that fibre to all premises (homes, commercial retail) is included in planning applications or that at least ducting is put in as part of all new developments as a minimum.
- Ensuring that any planning issues are considered and built into proposals within neighbouring authorities' plans.
- Adopting appropriate Planning Performance Agreements where advantageous to do so (positive fast-track planning agreement) such as agreed for the Leeds and Bradford Super Connected Cities Programme, consider the roll out of the principles elsewhere in the city region.
- Exploring the possibility of developing a fast-track planning approach for any additional street furniture or additional structures on schools or public buildings.
- Considering the implications of new infrastructure on environmental quality and amenity, particularly in high quality environments such as Conservation Areas.

## 6 Conclusion

6.8 Leeds City Region Planning Portfolios Board has prepared this Statement of Cooperation for Local Planning to outline the practical steps that are being taken to meet the Duty to Cooperate; the purpose of the Statement is twofold:

- To set out processes and practical steps to be followed going forward, that will strengthen the Leeds City Region authorities' approach to collaborative working;
- To outline the current collaborative work on strategic, cross-boundary issues that is ongoing within the Leeds City Region.

6.2 The Leeds City Region authorities have identified the following high level principles that will influence a joint approach to meeting the Duty to Cooperate:

- **Cooperation throughout the development plan process;**
- **Going beyond consultation;**
- **Taking a pragmatic approach;**
- **Responding to all requests to engage.**

6.3 The Planning Portfolios Board is committed to partnership working to ensure a joined-up approach to spatial planning including tackling cross-boundary issues and agreeing strategic priorities; the Portfolios Board has identified long-term priorities in an ambitious work programme.

6.4 This Statement identifies tools that can be used by authorities to demonstrate cooperation, including the Duty to Cooperate Table, Duty to Cooperate Statements, Statements of Common Ground and Memorandums of Understanding (MoU). This Statement also identifies processes that will support authorities in meeting the Duty to Cooperate; these include a commitment to consulting the Planning Portfolios Board on draft development plans. Some of the processes identified in this Statement are new and are therefore are likely to evolve; it is essential that these processes are adapted as required and it is proposed that this Statement be revised on an annual basis.

6.5 The governance structures within the Leeds City Region are also evolving, how these changes influence joint working on cross-boundary, strategic issues will need to be considered. The recently established West Yorkshire and York Combined Authority is one example.

### West Yorkshire and York Combined Authority

- 6.6 The West Yorkshire Combined Authority, created on 1<sup>st</sup> April 2014, is a statutory body corporate for the geographical area which covers the constituent authority districts of Calderdale, Bradford, Kirklees, Leeds and Wakefield. At the first meeting of the Board on the 1<sup>st</sup> April 2014, York also became a member of the Authority with full voting rights. It is proposed for York to become a constituent authority member of the Combined Authority by as early as April 2015, subject to the passage of a legislative reform order and local agreement.
- 6.7 The Combined Authority has been put in place by local agreement, and underpinned by local public and business support, in order to deliver the ambition of Councils and the LEP to oversee the long term delivery of public economic and transport investment, including the proposed Leeds City Region Economic Investment Fund set out in the City Deal, which includes the West Yorkshire Plus Transport Fund. Committees of the Combined Authority have been established for both transport and economic growth to oversee these two key functions with a view to further collaboration over the wider Leeds City Region area.
- 6.8 Work is ongoing to consider the potential roles of the Combined Authority in relation to the economic growth function taking into account the interrelationship to the Leeds City Region Enterprise Partnership. This could involve joint working around the development and planning agendas. To be effective and to avoid the risk of duplication and confusion, it is recognised that the Combined Authority and the Local Enterprise Partnership for the area must act seamlessly.

## **Appendix A: Interim Strategy Statement**

### **LEEDS CITY REGION INTERIM STRATEGY STATEMENT**

**21 April 2011**

#### **Background**

In July 2010 the government revoked the approved Regional Spatial Strategy for Yorkshire and the Humber. This decision has been contested through the courts with the result that currently, the RSS remains part of the Development Plan albeit with some uncertainty regarding the weight to be attached to it in decision making. In these circumstances there is considerable uncertainty surrounding the strategic policy framework for spatial planning in the Leeds City Region which addresses those matters that are 'bigger than local' and require collaboration between the Planning Authorities in the City Region.

The Government published the Localism Bill in December 2010 this includes a number of changes to the operation of planning legislation. As expected the Bill includes a 'duty to cooperate' on these strategic issues however this part of the Bill is likely to be subject to amendments and its operation will only become clear once the secondary legislation that gives effect to the duty is published. The Bill also deals with the revocation of regional strategies and associated with this in Clause 89 of the Bill is the revocation of orders that have saved policies from existing development plans (the revocation of saved policies may only apply to Structure Plan policy, a clarification is being sought on this). This will particularly affect those authorities who have yet to complete work on their Core Strategies. It is expected that this Bill will become an Act sometime later in 2011.

In the period before the Localism Bill becomes an Act there is a need for an interim strategy position to help manage the uncertainty on strategic policy and to make clear the continuing support for the policy principles in the RSS that support shared objectives across the City Region. Furthermore depending on the eventual content of the Act there may well be a longer period of time before the Local Planning Authorities can give effect to what ever procedures are put in place in the Act and to address the duty to cooperate and the potential gap created by the loss of previously saved policies

The City Region Partnership had been working on a city region strand for the wider Yorkshire and Humber Strategy that was being prepared by the Yorkshire and Humber Joint Board. This Yorkshire and Humber Joint Board was dissolved and its strategy work ceased following the general election. However the City Region decided that it is important to continue work across the city region on a strategy and investment plan that would bring greater coherence to policy and investment activities of the City Region Partnership and would support the development of the City Region Local Enterprise Partnership. The development of the interim strategy statement for spatial planning is seen as part of this wider strategy development activity.

#### **Proposed Interim Strategy Statement**

The 10 Local Planning Authorities in the City Region Partnership that are required to prepare LDF Core Strategies (NYCC the eleventh local authority is a planning authority in respect of minerals and

waste only) have all used the RSS as a starting point for their Core Strategies and support the urban transformation ambition that is at the core of the RSS. Where there are adopted Core Strategies (Harrogate and Wakefield) those documents have a strong policy relationship with the RSS. Authorities who have not yet reached that stage are reviewing the relevance of the RSS approach in their ongoing work on Core Strategies. All authorities recognise that the policies in the former RSS which articulate the urban transformation ambition, should provide the start point for an interim strategy statement. Along with policies that safeguard the environmental assets of the city region and the key spatial investment priorities that are set out in the already agreed city region strategies.

### **Policy approach in the strategy**

The authorities in the partnership continue to support the broad policy thrust of the former RSS and the principles of urban transformation contained in the Plan. To ensure these principles are retained the authorities propose to include the following policies from the approved RSS that address spatial principles in a City Region Interim Strategy Statement.

#### Spatial Principles

Policy YH1 Overall approach and key spatial priorities (as these apply to the Leeds City Region)

Policy YH2 Climate Change and Resource use

Policy YH3 Working Together (as this applies to the Leeds City Region)

Policy YH4 Regional Cities and sub regional cities and towns

Policy YH5 Principal Towns

Policy YH6 Local service centres and rural (and coastal) areas (as these apply to the Leeds City Region)

Policy YH7 Location of Development

Policy YH8 Green Infrastructure

Policy YH9 Green Belt (as this applies to Leeds City Region)

#### Thematic Policies

To ensure that the city region's environmental assets are effectively safeguarded the following thematic policies from the RSS will be included in the City Region Interim Policy Statement.

ENV1 Development and Flood Risk

ENV2 Water Resources

ENV3 Water Quality

ENV6 Forestry, Trees and Woodland

ENV7 Agricultural Land

ENV8 Biodiversity

ENV9 Historic Environment

ENV10 Landscape

#### H4 Affordable housing

##### City Region thematic strategies

The strategy statement also captures the spatial implications of key strategic investment priorities in the city region, set out below. These priorities should be reflected in Core Strategies and other Development Plan Documents.

*Housing and Regeneration Strategy and Investment Plan* - This strategy and investment Plan has four Key Priorities for Investment:

- Accelerated strategic growth where investment will support the growth areas in Barnsley Wakefield and Calderdale
- Promoting eco living where investment will support the delivery of:
  - the four Urban Eco Settlements: Aire Valley Leeds, York Northwest, Bradford-Shipley Canal Road Corridor, and North Kirklees / South Dewsbury; and
  - the Leeds City Region Domestic Energy Efficiency Programme to eco-retrofit the existing housing stock across the city region.
- Delivering strategic urban renewal which will support the growth and regeneration ambitions in the Leeds-Bradford Corridor, Green Corridor and Kirklees A62 Corridor.
- Supporting rural economic renaissance in the Colne and Calder Valleys

*Leeds City Region Transport Strategy* - This strategy describes three broad spatial priorities for transport investment:

- Priority A transport links beyond the city region
- Priority B developing the roles of the sub regional cities and towns and priority areas for regeneration and housing growth
- Priority C strengthening the service roles of principal towns

*Leeds City Region Green Infrastructure Strategy* -The strategy:

- Identifies the value of green infrastructure assets and the case for investing in them
- Ensures green infrastructure complements other city region investment priorities
- Establishes the current priorities for green infrastructure investment
- Impels planning and housing policy work to support widespread improvements in green infrastructure

#### **Further Work to develop the Strategy**

Clearly, what is set out is an interim position and there will need to be further work in the context of the commitment to produce a broadly based but economic-led City Region Strategy and Investment Plan.

The RSS included policies on the quantum and distribution of development, which have not been addressed in the interim strategy statement. The local authorities within the city region partnership have all undertaken reviews of the evidence that underpins these policies as part of their plan-making activities. Those authorities that have undertaken reviews in the past 12-18 months have taken account of the local implications of the range of factors that have led to a dramatic slow down in rates of development. These local reviews have led to different conclusions regarding the

capacity of an area to deliver development. The partnership will work with individual authorities to help develop our collective understanding of the social and economic factors that are driving the need and demand for development, and the financial, economic and delivery factors that are restricting the ability to meet the need and demand for development. We will use our improved understanding of these factors in the development of a second iteration of the strategy statement that will examine quantum and distribution of development and is expected to form part of the wider economic led city region strategy.

All this work will contribute to a more rounded Strategy Statement

Leeds City Region Secretariat

Regional Policy Team

Leeds City Council

Civic Hall

Leeds

LS1 1UR



## Appendix B: Leeds City Region Partner Development Plans' Status

(June 2014)

<b>Barnsley</b>	Core Strategy	Adopted Sept 2011
	Development Sites & Places	Consultation draft June 2013
	Combined Local Plan	September 2014
<b>Bradford</b>	Core Strategy	Publication Draft approved by Council Dec 2013
		Published for Representations Feb/March 2014
		Submission anticipated Sept 2014
<b>Calderdale</b>	Local Plan	Preferred options Oct 2012
		Publish Local Plan Sept 2014
<b>Craven</b>	Local Plan	Early engagement June / July 2013
		Further engagement 2014 on pre-publication draft
<b>Harrogate</b>	Core Strategy	Adopted Feb 2009
	Sites & Policies DPD	Submission draft consultation June 2013
		Submitted Nov 2013
		Examination April 2014
		Full council meeting May 2014 to discuss whether to withdraw DPD (concerns over objective assessment of housing need)
<b>Kirklees</b>	Core Strategy	Submitted April 2013
		Pre Inquiry hearing Oct 2013
		Withdrawn Nov 2013 to undertake further work
<b>Leeds</b>	Core Strategy	Examination Oct 2013/May 2014
		Initial view on main modifications Jan 2014 and final modifications received from inspector 6 <sup>th</sup> June. Final report expected August
	Site Allocations	Issues and options published – reps received
	CIL	Examination 3 <sup>rd</sup> June 2014, report expected August
	Natural Resources and Waste DPD	Minerals and Waste Plan adopted January 2013

<b>Selby</b>	Core Strategy	Adopted October 2013
		Legal challenge to Core Strategy raised December 2013
		High Court Hearings 10-14 July 2014
	Site Allocations Plan (the Sites and Policies Plan – SAPP)	Proceeding to Issues and Options autumn / winter 2014
<b>Wakefield</b>	Core Strategy & Dev. Policies	Adopted April 2009
	Sites Specific Policies	Adopted Sept 2012
<b>York</b>	Local Plan	Consultation on sites spring 2014
		Autumn 2014 submission draft
<b>North Yorks</b>	Joint Minerals & Waste Plan NYCC NYNP & CYC	Early engagement ongoing
		Consultation 2014
	Marine Aggregates Study	Draft Nov 2013
		Finalised May 2014

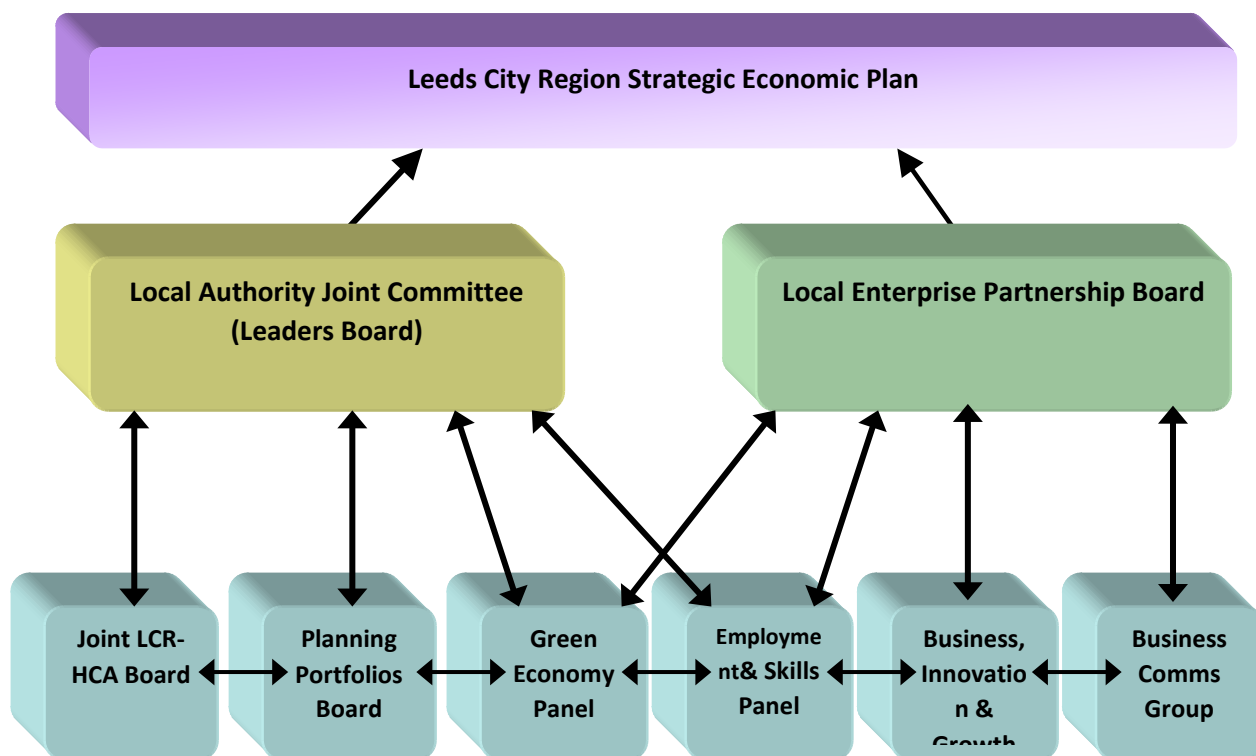
## Appendix C: Duty to Cooperate Table Template

Ref	Strategic Issue	Impact	Areas affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
<i>Ref</i>	<i>Summary of the issue (the topics below should all be considered along with any other locally identified strategic priorities).</i>	<i>Description of why it is an issue for neighbouring authorities / stakeholders.</i>	<i>Details of the authorities / stakeholders affected by the issue.</i>	<i>Evidence to show there is an issue (including links to source documents)</i>	<i>Details of how the issue can be overcome or managed</i>	<i>How the issue will be monitored including key indicators and trigger points</i>	<i>Agreed actions (including who lead &amp; timescale)</i>	<i>Relevant strategic priority in <a href="#">para 156</a></i>
	Housing							
	Employment							
	Retail / Leisure Commercial							
	Physical Infrastructure: Transport							
	Physical infrastructure: Other							
	Minerals							
	Energy							
	Social Infrastructure							
	Climate Change							
	Natural Environment							
	Gypsies and Travellers							
	Waste							

## Appendix D: Leeds City Region Governance & Operational Groups

The Leeds City Region has worked in Partnership since 2004 when the Leaders of the eleven local authority partners decided that strategic economic policy and delivery would be best served by collaborating at the functional economic area level, which is the Leeds City Region, rather than based on administrative areas. The Leeds City Region Partnership is founded on collaboration, evidence based policy and implementation, and following the establishment of the Leeds City Region Enterprise Partnership (LEP), has seen an increased focus on delivery. The following are key milestones for the Partnership:

- Leeds City Region Concordat (2004)
- Establishment of the Leeds City Region Leaders Board (2007)
- Leeds City Region Multi Area Agreement with Government (2008)
- Leeds City Region Forerunner agreement with Government (2009)
- Establishment of the Leeds City Region Enterprise Partnership (2011)
- Leeds City Region LEP Plan (2011)
- Leeds City Region City Deal with Government (2012)
- Leeds City Region Enterprise Partnership Strategic Economic Plan (March 2014)



The diagram above provides an illustration of the Leeds City Region Governance Framework as it currently stands; it excludes the Combined Authority arrangements which are subject to confirmation:

#### The Leeds City Region Partnership (Leaders Board Joint Committee)

The Leeds City Region Leaders Board brings together the elected leaders of the 11 partner councils to take strategic decisions on behalf of the Leeds City Region. The Board has been legally constituted as a Joint Committee since 2007 and is governed by an annually agreed set of procedures and protocols, central to which is the principle of 'one member, one vote'. A key role of the Leaders Board has been to provide an overview and a level of continuity for strategic planning. The Leaders Board also sets direction and oversees delivery on transport, housing, regeneration and the green economy in partnership with the Leeds City Region Enterprise Partnership Board.

#### The LEP Board

The Leeds City Region LEP Board brings together the private and public sectors in a unique partnership to drive economic growth and competitiveness. The LEP is charged with directing its efforts to facilitating and creating the environment for economic growth. The LEP Plan expressly provides that the LEP and Leaders Board will work together to unlock the growth potential of the City Region economy by providing the cross-sector leadership required and developing a framework for delivery with partners. The LEP Plan provides that activity will be clearly aligned to achievement of the planned growth targets. It will also align with national priorities for sustainable economic growth and will build on local economic priorities. There is therefore a direct and substantive link between the activities of the LEP and Strategic Planning in the City Region.

The Leeds City Region Enterprise Partnership's recent Strategic Economic Plan submission to Government (March 2014) provides the most recent overarching strategic policy framework and investment priorities to drive and accelerate economic growth and competitiveness across the city region.

#### Business, Innovation and Growth Panel

The Business, Innovation and Growth (BIG) Panel will act as the designated body, on behalf of the Local Enterprise Partnership, (LEP) to:

- devise objectives, in line with the LEP's economic strategy, to drive business growth in the Leeds City Region, focusing on international trade, inward investment, innovation, and supporting SME growth;

- deliver against these objectives by commissioning and overseeing key projects and work programmes;
- provide oversight with UKTI to the international trade and investment elements of the Leeds City Region Deal through its additional function as the Leeds City Region Joint Trade and Investment Board.

The Panel is industry-led to ensure that its work is driven by the needs of business, and that interventions meet the existing and future needs of the Leeds City Region economy. The BIG Panel forges strong links with a broad coalition of partners to drive delivery of the LEP's economic plan. In particular it has links with: local authority economic development teams; HEI knowledge transfer departments; government departments and agencies including BIS, UKTI, the TSB and Nesta; inward investment and destination marketing agencies; business representative organisations and delivery agencies; and other relevant partners.

#### Employment and Skills Panel

The Employment and Skills Panel brings together policy-makers, delivery partners and employers in key business sectors. It works closely with the Leeds City Region Skills Partnership to achieve the LEP's aims. Research and analysis that has been commissioned by the Panel includes an analysis of the city region labour market (2013), a skills report and a skills plan (2013-15).

The Employment and Skills Panel brings together employers in key sectors, skills providers, funding agencies, policymakers and local authority leaders. It works closely with the Leeds City Region Skills Network to better align skills provision to the needs of employers and to support delivery of the LEPs Skills Plan and priorities. The Panel has commissioned significant employer research to identify need in 2012, publishes an annual assessment of the city region labour market and has developed a Skills Plan (2013).

The Panel has been instrumental in securing c.£40m of funds to support the delivery of employment and skills programmes across the city region. Its private sector representatives play a key role either as Task Group leaders or as champions for their sectors – helping to identify and address particular skills challenges affecting businesses within their sectors.

#### Leeds City Region HCA Board

The Leeds City Region Homes and Communities Agency (LCR HCA Board) is a joint board between the Leeds City Region Partnership and the Homes and Communities Agency. The LCR HCA Board

oversees the delivery of strategic housing and regeneration policy and delivery of projects and programmes, as set out in the Housing and Regeneration Investment Plan and associated strategies. The Board is responsible for advising the Partnership on levels of housing and regeneration investment needed, and influences the distribution of HCA and other housing and regeneration investments across the City Region.

#### Business Communications Group (BCG)

The BCG is responsible for communicating information about the LEP's work to the business community, and acts as an advisory group to the LEP Board about barriers to growth. The group includes representation from the Chamber of Commerce and the private sector.

#### Green Economy Panel

The Leeds City Region Green Economy Panel sets direction and oversees delivery on the Smart Resources agenda, particularly in relation to low carbon and sustainable energy matters. The Panel's core objective is to achieve a substantial and continued decrease in carbon emissions, alongside an increase in GVA and employment. Panel members represent both the public and private sectors.

#### The Planning Portfolios Board

The Planning Portfolios Board has Councillor representation from each LPA (and Senior Officer support), it was established specifically to provide political oversight on strategic planning matters and the Duty to Cooperate, advising the Leeds City Region Leaders Board and Leeds City Region Enterprise Board on appropriate actions that could / should be taken in respect of these planning matters. The Board is tasked with providing political oversight for matters relating to the Partnership's role in supporting authorities in ensuring compliance with the legal requirements of the Duty to Cooperate.

## **Appendix E: Draft Terms of Reference: Planning Portfolios Board**

### **1.0 MEMBERSHIP**

- 1.1 The cabinet member who holds the responsibility for Strategic Planning and the Development Plan from each authority within the Partnership (or appropriate substitute).
- 1.2 The Head of Planning from each authority (or an appropriate substitute) may attend meetings in an advisory capacity.
- 1.3 The Chair and Deputy for the group shall be selected from amongst the membership. These roles shall rotate on a yearly basis

### **2.0 ROLE OF THE GROUP**

- 2.1 The proposed role of the Group is:

***To provide political oversight on strategic planning matters and the Duty to Cooperate, advising the Leeds City Region Leaders Board and Local Enterprise Board on appropriate actions that could / should be taken in respect of these matters.***

- 2.2 Strategic Planning is defined as any matter relating to sustainable development, infrastructure planning and land use planning that affects more than one local authority within the partnership. Some issues may also be reported to the Leeds City Region HCA Board as appropriate.
- 2.3 The group will in particular provide political oversight for matters relating to the Partnership's role in supporting authorities in ensuring compliance with the legal requirements of the *Duty to Cooperate* (S110 of the Localism Act).

### **3.0 FREQUENCY OF MEETINGS**

- 3.1 It is proposed that the group shall meet 4 times a year with meetings timed to enable matters to be taken to the Leaders Board and LEP Board in a timely fashion.

### **4.0 OFFICER SUPPORT**

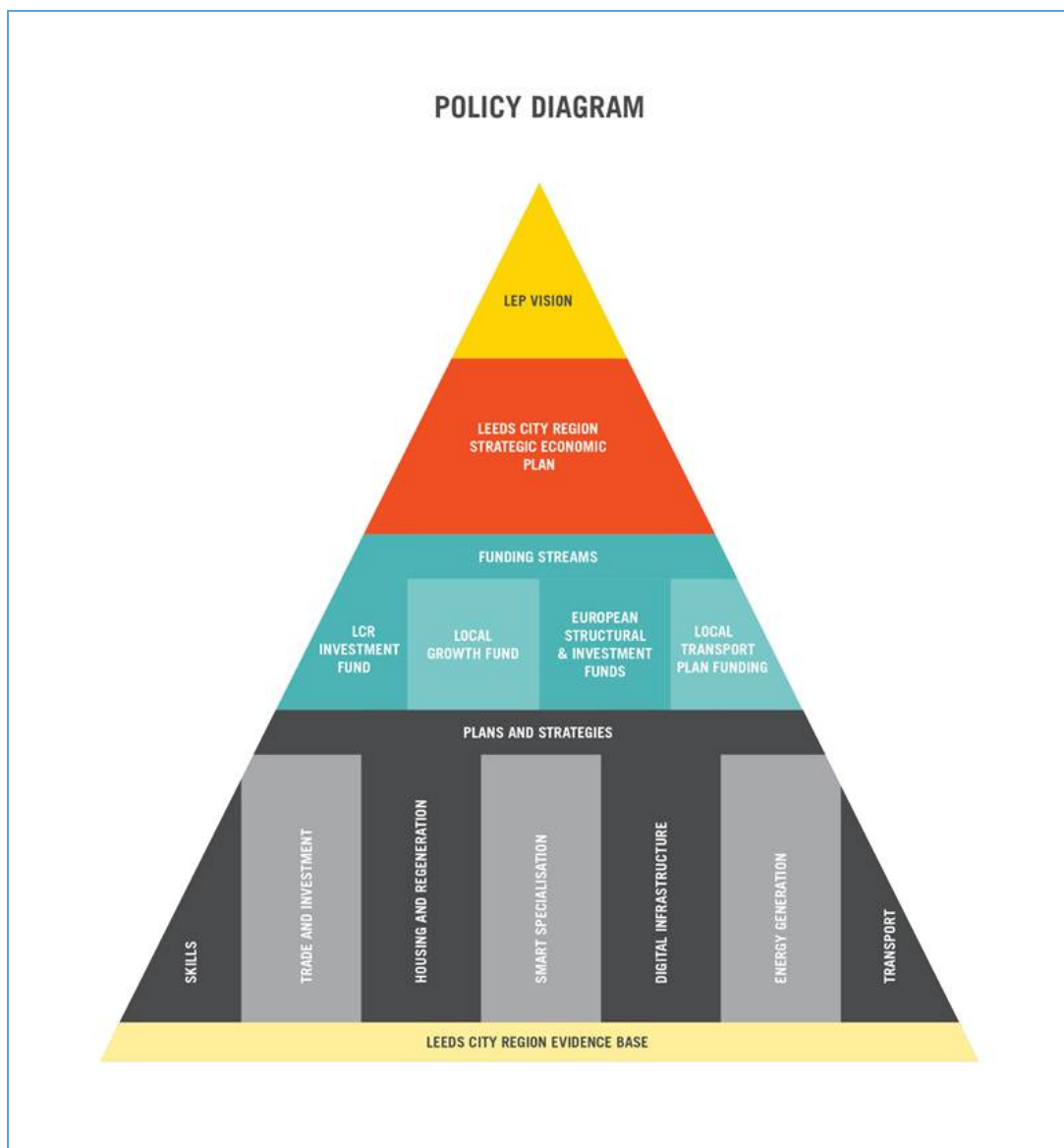
- 4.1 The Leeds City Region Secretariat shall provide officer support with the lead for this support being the Head of Infrastructure and Investment.
- 4.2 The Leeds City Region Heads of Planning Group will provide the wider officer support undertaking tasks as requested by the Leeds City Region Planning Portfolios Group on strategic planning matters.
- 4.3 Agenda and papers will normally be circulated at least 7 days in advance of the meetings.



## Appendix F: Leeds City Region Evidence Base

### Introduction

Over the course of the 10 years of the Leeds City Region partnership, a robust and comprehensive evidence base has been produced. This has been continuously updated and refined, and has formed the basis for the suite of strategy documents (e.g. Housing and Regeneration Strategy and Investment Framework; Connectivity Strategy; Green Infrastructure Strategy; Skills Strategy etc.) and plans upon which Leeds City Region policy is based. These strategy and policy documents, summarised in the diagram below, have formed the basis of the interventions proposed in our Strategic Economic Plan.



- Additionally, as part of the Strategic Economic Plan process we have commissioned new work where we felt our evidence needed refreshing, or where there were gaps in our knowledge.
- The list below provides a synopsis of the key LEP policy, strategy and evidence documents and, where available, a link to an online version.

## Leeds City Region LEP Policy, Strategy and Evidence Documents

### Overarching strategy and policy documents

- [Strategic Economic Plan](#) - in which we set out our long-term vision and ambitions for the City Region economy. It also sets out what support we are asking for from the government to help us achieve this vision, in terms of both funding from the Local Growth Fund, and additional freedoms and flexibilities to give us the power to deliver on our ambition.
- [Leeds City Region European Structural and Investment Funds Strategy \(2014\)](#) - complements our SEP and describes local needs and opportunities, desired outcomes and the rationale for proposed projects and programmes for our ESIF strategy for 2014-20.
- **Leeds City Region Investment Plan (2013, not published)** - sets out the ways in which we envisage that public and private investment will play their part in achieving our vision as set out in the LEP Plan.
- [Leeds City Region City Deal \(2012\)](#) – our landmark deal with government giving the City Region and its partner local authorities greater control over spending and decision-making to ensure interventions are in line with what our economy needs.
- [Leeds City Region LEP Plan \(2011\)](#) - the LEP Board’s vision and strategy for growth across the City Region – was agreed in 2011 and sets the overall strategic parameters for our work.

### Thematic policies, strategies and evidence

- [Trade & Investment Plan \(2014, publication forthcoming\)](#) – details how the LEP intends to increase inward investment into and exports from Leeds City Region.
- [Housing & Regeneration Strategy \(2009, refreshed 2014\)](#) – a refresh of our 2009 Housing & Regeneration Strategy – sets the context for future investment decisions by recognising market conditions (where they relate to both challenges and opportunities) and strategy drivers.
- [Housing & Regeneration Investment Framework \(2010\)](#) – sets out the strategic investment priorities for major housing and regeneration schemes across the city region.
- [Leeds City Region Skills Plan \(2013\)](#) – sets out how the LEP intends to achieve its aim of creating a skilled and flexible workforce to support improved productivity and jobs growth.
- [Leeds City Region Labour Market Analysis \(2013\)](#) - presents the state of the City Region labour market within the context of its economy. It shows the key supply and demand side challenges, the strengths and weaknesses and prospects for growth.
- [West Yorkshire plus Transport Fund – a draft prospectus for change \(2013\)](#) - outlines our City Deal and provides a summary of the West Yorkshire plus Transport Fund schemes, explaining their job creation potential and contribution towards economic growth.
- [Digital Infrastructure Plan \(2012\)](#) – sets out how over the next 20 years the City Region intends to develop its digital infrastructure to maximise exploitation of digital communications technology and boost its economic competitiveness.
- [Advanced Manufacturing in Leeds City Region \(2012\)](#) - analysis of the advanced manufacturing sector in the City Region detailing the size and characteristics of the sector, and its prospects for growth.
- [Beyond Borders: Report on Leeds City Region Exports \(2012\)](#) – joint report with local Chambers of Commerce considering how to encourage more businesses to start exporting and support existing exporters in targeting new international markets. It includes the identification of potential new markets, and analysis of the barriers to exporting.

- [My Journey: West Yorkshire Local Transport Plan 2011-2026 \(2012\)](#) - outlines the West Yorkshire Local Transport Plan (LTP) for 2011 to 2026. The LTP is the statutory plan for transport in West Yorkshire and sets out the needs, ambitions and strategy over a relatively long period of time as well as detailed spending proposals in the first three years.
- [City of York Local Transport Plan 2011 – 2031 \(2011\)](#) - sets out the transport policies and measures that will contribute to the city's economic prosperity over the next 20 years, whilst meeting challenging national and local targets for reducing emissions.
- [Leeds City Region Mini-Stern Review \(2011\)](#) - reviews the cost and carbon effectiveness of a wide range of low carbon options. Explores the scope for their deployment, their associated investment needs, financial returns and carbon savings, and the implications for the economy and employment.
- [Leeds City Region Green Jobs report \(2011\)](#) - analysis of the green jobs sector in the City Region, including a summary of regional assets, renewable & low carbon energy capacity projections, existing green jobs, higher & further education sectors, growth opportunities and vulnerable sectors.
- [Leeds City Region Business Survey \(2011\)](#) – locally-commissioned survey of businesses across the City Region, providing analysis of business attitudes consistent with the National Business Survey.
- [Green Infrastructure Strategy \(2010\)](#) - analysis of the City Region's green infrastructure and natural assets, presenting a strategy focusing on how this green infrastructure can deliver our sustainable urban growth agenda.
- [Leeds City Region Transport Strategy \(2009\)](#) – identifies the main issues and priority challenges for transport in Leeds City Region, the wider policy and spatial outcomes that transport needs to support, and a framework for developing interventions.
- [Leeds City Region Key Sector Strategy \(2014, publication forthcoming\)](#) - identifies the key sectors which can play an important role in driving growth within the City Region, and the assets, leading businesses and opportunities within them.
- [Leeds City Region Smart Specialisation Strategy \(2014, publication forthcoming\)](#) - analysis of the City Region's innovation assets, strengths, weaknesses and opportunities, and sets out the City Region's strategy to drive greater levels of innovation and implement smart specialisation across the City Region.
- [Leeds City Region low carbon energy investment roadmap \(forthcoming\)](#) – analysis of the opportunities for low carbon energy generation in the City Region to define the LEP's investment priorities.
- [Leeds City Region Economic Assessment \(2014, publication forthcoming\)](#) – assessment of the economic situation across Leeds City Region, including analysis of trends over the past decade and comparison of economic performance against England and other areas.
- [West Yorkshire Local Aggregates Assessment \(2014\)](#) – to be finalised.
- [North Yorkshire and York Local Aggregates Assessment \(2014\)](#) - Local Aggregate Assessment for the North Yorkshire Sub-region was also finalised and submitted to the (regional) Aggregates Working Party in May 2014.

## **Appendix G: Leeds City Region Planning Charter for Major Investment Proposals (2012)**

**The Leeds City Region Local Enterprise Partnership has developed a charter which sets out how the Local Planning Authorities and Developers will work together to ensure that proposals for major new investments will be dealt with in an efficient and effective way throughout the city region. The Charter represents the first step towards creating a seamless service for investors wherever they choose to locate in the city region.**

### **Definitions**

What is a major investment proposal?

- They are of major strategic significance in terms of one or more of the following; job growth, investment value and regeneration. Clearly the scale of this will be different in different parts of the city region, for instance the scale of proposal that is strategically significant in Bradford or Harrogate would be different. Each authority will set out which applications will be subject to the Charter;
- Or are proposals that are eligible for large scale, time limited, public funds.

### **The Charter Pledge**

Charter Pledge sets out clearly what the developer can expect from the Local Authority and vice versa.

#### **Local Authorities will:**

- Work together to ensure and maintain a comprehensive and up to date Development Plan framework. This will:
  - Enable the delivery of the priorities in the LEP Plan;
  - Provide certainty over development opportunities;
  - and help inform investment decisions.
- The Local Authority will nominate a project co-ordinator to lead the process in conjunction with the Developer. The Local Authority nominee will:
  - Agree with the Developer a timetable and milestones for the application to deliver a decision in the shortest period of time practicable;
  - Set out requirements for consultation (internal and external) and work with the Developer to ensure appropriate pre application public consultation takes place;
  - Set out the Local Authority's aspirations for any legal agreement and land transactions;
  - Maintain a regular dialogue with the developer and ensure changes required by either the local authority or the Developer are made promptly.

- Work in partnership with customers and stakeholders to bring forward successful applications that deliver high quality sustainable development.
- Work with customers to understand their business needs and development proposals to ensure that everyone involved understands scheme viability and deliverability.
- Undertake regular reviews, led by the Local Authorities, of the service we deliver in conjunction with customers giving all involved opportunity to shape future delivery.

**Developers will:**

- Agree a Project Plan, including key stages and milestones, which take into account the need for discussion and review to take place, keeping the Council informed of progress at all key stages.
- Undertake an urban design analysis to inform the evolution of the scheme and the subsequent development of the design and access statement.
- Engage in meaningful pre application discussions, with adequate time allowed for the preparation of essential information and assessment proposals, including appropriate community consultation.
- Respond within the agreed timescales to requests for further information and/or revisions.
- Attend project meetings with relevant persons.
- Submit a complete planning application with appropriate supporting information as agreed with the Council, including a draft legal agreement where appropriate.

The Local Enterprise Partnership Board will receive regular reports on the performance of the agreement and will review it as required.

## **Appendix H: South Pennine Memorandum of Understanding on Renewable Technologies**

### **PURPOSE**

This Memorandum of Understanding establishes a framework for cooperation between South Pennine local authorities with respect to strategic planning and development issues relating to renewable energy, in particular wind energy. It is framed within the context of the Section 110 of the Localism Act 2011 and the duty to cooperate in relation to the planning of sustainable development. It sets out the way in which the authorities have, and will continue to, consult one another and work together on matters which affect the South Pennine area.

In line with the National Planning Policy Framework, particularly paragraphs 97 and 98, Planning Authorities will seek to take a positive approach to renewable energy development both in development planning and management. This will include taking opportunities to maximise strategic cross-border benefits as well as ensuring that any potential negative impacts are minimised or avoided.

### **PARTIES TO THE MEMORANDUM**

The Memorandum is agreed by the following Local Authorities:

*Insert names*

### **OBJECTIVES**

The Memorandum has the following broad objectives:

- To help secure a process and framework enabling a consistent strategic approach particularly to Wind Energy and also to other Renewable Energy issues as appropriate; including development management, strategic planning and monitoring between neighbouring local authorities
- To enable a sharing of information and views and, where appropriate, to facilitate joint working on strategic issues which affect more than one local authority area
- To facilitate joint research and procurement between neighbouring authorities
- To facilitate strategic cooperation and partnership on issues of shared interest with statutory consultees such as the Environment Agency, Natural England and English Heritage and other key consultees including planning, delivering, managing and mitigating renewable energy and its impacts

### **TOPIC ISSUES**

The principal topics where cooperation are considered to be valuable are:

- Effective and timely consultation on planning applications, EIA Screening Opinions and Environmental Scoping Reports of cross-border significance in the South Pennines and related areas
- Development of mutually consistent databases on planning applications to enable “cumulative impact” issues to be addressed particularly on wind energy but also other technologies
- Consistent application of landscape character assessments such as the “Julie Martin Study” (or successor documents); the Peak District National Park Landscape Strategy and Action Plan and,

as appropriate, other evidence base documents or cross-border landscape studies, when assessing planning proposals

- Joint procurement of evidence base documents and professional expertise where this would bring economies of scale and be mutually beneficial
- An approach to Planning Policy development and Development Management that takes into account as appropriate cross border effects on:
  - Landscape and visual impact
  - Cumulative impact
  - Historic landscape character
  - Ecology including flora, fauna and peat
  - Water supply, hydrogeology and flood risk
  - Recreational assets, bridleways and footpaths
  - Green infrastructure
  - Noise
  - Cultural and built heritage
  - Shadow Flicker
  - Socio-economic benefits
  - Access and grid connections
  - Telecommunications and radar
- Cooperation on planning issues relating to the implementation of renewable networks such as District Heating schemes; energy from waste or biomass particularly where these are identified in studies such as the Greater Manchester, Yorkshire and Humber, Lancashire and East Midlands Renewable and Low Energy Studies and have clear cross-border affects
- Joint working as appropriate on policy development and implementation relating to low carbon development including Allowable Solutions and Zero Carbon development
- Consultation on Local Plan policies and SPD's on renewable energy beyond immediate neighbours where proposals are innovative or of wider interest
- Support as appropriate at Planning Inquiries
- Information sharing on current "good practice" at local and sub-regional level

#### **MECHANISMS FOR COOPERATION**

- Regular meetings will be held (at least 3 times per year) with special meetings if necessary, such as when triggered by an application of major cross-border significance or other specific issues of common interest
- Renewable energy databases will be regularly updated and circulated in particular to inform Local Authority Monitoring Reports
- Consultations on wind energy planning applications, Screening Opinions and Environmental Scoping opinions with neighbouring planning authorities will occur in the following circumstances:
  - Affected neighbouring authorities where the Zone of Visual Influence shows an impact on land outside the host authority area
  - Where there are significant impacts on Recreational Trails of sub-regional or greater significance

- Consultations on non-wind renewable energy applications and Environmental Scoping Opinions will be considered on a case by case basis
- Liaison on development of Planning Policy documents and SPD's
- Sharing of development management policies and validation requirements to facilitate a standardised approach to planning applications across the South Pennines

## **LIMITATIONS**

The Local Authorities recognise that there will not always be full agreement with respect to all of the issues on which they have agreed to cooperate. For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the local authorities in the determination of any planning application, participation in evidence base studies or in the exercise of any of its statutory powers and duties.

Signed:

Organisation:

Position:

Date:

## **Annex One – Background Context**

### **BACKGROUND**

The South Pennine landscape straddles the borders of Greater Manchester, Derbyshire, Lancashire and North, West and South Yorkshire. Upland areas are particularly attractive for wind energy developments, ranging from very large wind farms to small individual turbines. While parts of the area such as the Peak District National Park, Forest of Bowland Area of Outstanding Natural Beauty and the South Pennine Special Protection Area/Special Area of Conservation are subject to national landscape or conservation designations substantial areas are not. Issues of cumulative visual impact from wind energy proposals are the major cross-border issue and were clearly identified in the "Landscape Capacity Study for Wind Energy Developments in the South Pennines" (2010) commissioned jointly from Julie Martin Associates by a number of authorities. There is a history of cross-border consultation on renewable energy dating back to the early 1990's through the Standing Conference of South Pennine Authorities (SCOSPA).

While wind power is the dominant cross-border energy issue other forms of renewable energy that are being developed in the area include solar power, biomass and small scale hydro. These can have localised cross-border impacts. Opportunities for development were identified in the jointly commissioned "Renewable and Low Carbon Energy Study" (Maslen 2010). Other separate studies exist for the East Midlands (LUC, CSE and SQW 2011) Greater Manchester (Aecom 2009), Lancashire (SQW/Maslen 2011/12) and Yorkshire and Humber Low Carbon and Renewable Energy Capacity Study (Aecom 2011).



## **Appendix 3**

### **Leeds City Region Local Plan progress position**

**LCR DEVELOPMENT PLANS' STATUS UPDATE**  
(Revised November 14)

Barnsley	Core Strategy	Adopted Sept 2011
	Development Sites & Places	Consultation draft June 2013
	Combined Local Plan	October 2014 (Publication Version Summer 2015)
Bradford	Core Strategy	Publication Draft approved by Council Dec 2013
		Published for Representations Feb/March 2014
		Submission late Autumn 2014 (EIP early 2015)
Calderdale	Local Plan	Single Local Plan
		LDS Early 2015
		Publication draft 2016
Craven	Local Plan	Early engagement June / July 2013
		Consultation from 3 <sup>rd</sup> Nov on pre-publication draft
		Move to single local plan (EIP 2015)
Harrogate	Core Strategy	Adopted Feb 2009
	Sites & Policies DPD	Examination April 2014
		DPD Withdrawn June 2014
	Local Plan	3 year timetable (EIP 2016/17)
Kirklees	Local Plan	Early engagement and evidence gathering ongoing
		Early engagement period currently (to 19 <sup>th</sup> Dec 2014)
		Draft plan late summer 2015
Leeds	Core Strategy	Examination Oct 2013 / May 2014,
		Adopted Nov 2014
	Site Allocations	Draft principles Dec 2014
	CIL	Adopted Nov 2014
	Natural Resources & Waste DPD	Minerals & Waste Plan adopted January 2013
Selby	Core Strategy	Adopted October 2013
		Legal challenge to Core Strategy dismissed
		High Court Hearings 10-14 July 2014 - awaiting outcome
	Site Allocations Plan (the Sites and Policies Plan – SAPP)	Proceeding to Issues & Options autumn / winter 2014
	CIL	Consultation period currently.
	CIL	Consultation on draft charging schedule complete proceeding to adoption June 2015.
Wakefield	Core Strategy & Dev. Policies	Adopted April 2009
	Central Wakefield Area Action Plan	Adopted 2009
	Waste	Adopted 2009
	Sites Specific Policies	Adopted Sept 2012
	Retail & Town Centre Local Plan	Early Engagement Consultation 2013; Draft Plan Consultation early 2015
	Leisure, Recreation & Open Space Local Plan	Early Engagement Consultation 2013; Draft Plan Consultation early 2015
	CIL	Consultation complete – report to Cabinet Dec 2014
York	Local Plan	Consultation on Preferred Options, June 2013
		Further Sites Consultation, 4 June – 16 July 2014
		Autumn 2014 draft publication for consultation
North Yorks	Joint Minerals & Waste Plan	Consultation undertaken 2014
	NYCC NYNP & CYC	Preferred options Nov 14 (timing issue with elections)
	Marine Aggregates Study	Draft Nov 2013, Finalised May 14

## **Appendix 4**

**Core Strategy Leeds City Region Duty to cooperate strategic issues table (endorsed October 2014)**

**Bradford Core Strategy: duty to co-operate**

Section 110 of the Localism Act, November 2011, imposes a duty on councils to co-operate with other councils and bodies such as the Environment Agency and the Highways Agency on planning issues that cross administrative boundaries. The duty is explained in the national planning policy framework paragraphs 178 to 181. In particular paragraph 181 states: “Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their local plans are submitted for examination”.

The intention of the legislation is that the duty is carried out before councils make formal decisions on plans, with those decisions taking account of the outcome of the co-operation process. The duty applies to local planning authorities but also the following bodies:

The table below sets out the latest analysis of issues and proposed actions derived from the discussions held so far with relevant neighbouring LPAs and bodies since the new duty came into force. This information will be central to demonstrating that the duty has been carried out appropriately. This is an updated version from the one issued at Publication Draft and reflects work since publication. Further detail on the Councils Discharge of the Duty can be found in the related background paper on ‘Duty to Cooperate’ which sets out both the processes in more detail as well as more details on the strategic issues and cross boundary relationships.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
<i>Ref</i>	<i>Summary of the issue</i>	<i>Description of why it is an issue for neighbouring authorities</i>	<i>Details of the authorities affected by the issue</i>	<i>Evidence to show there is an issue (including links to source documents)</i>	<i>Details of how the issue can be overcome or managed</i>	<i>How the issue will be monitored including key indicators and trigger points</i>	<b>Agreed actions (including who is to lead &amp; timescale)</b>	<i>Relevant strategic priority in para 156</i>
1 A	Scale and location of new land for homes	Impact on function of green belt	Leeds, Kirklees, Calderdale , Harrogate, North Yorkshire and Craven	Infrastructure Plan  Growth study ( includes strategic level green belt assessment)  Settlement study  SHLAA  Bradford District Housing Requirement Study  Bradford Strategic Housing Market Assessment	Strategic Housing Land Availability Assessment (SHLAA) sets out constrained potential supply of land in terms of both total quantum (approximately 54,000 dwellings) and distribution. Total includes large amount of Green belt land (Approximately 19,000 dwellings). Exceptional circumstances demonstrated to warrant changes to green belt in order to fully meet objectively assessed need and comply with NPPF. Other Local Planning Authorities (LPAs) are not planning to meet any of Bradford Districts need.  Growth study informed broad location of selective changes required under exceptional	Allocations Development Plan Document revised green belt boundary.	Engage with adjoining Councils in agreeing detailed methodology for site selection and green belt review when undertaken through the Allocations DPD in line with Updated Local Development Scheme..  Minimise the overall need for green Belt release under exceptional circumstances by using non green belt land that is deliverable and suitable.	Housing need

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					<p>Circumstances to meet need.</p> <p>Criteria in green belt Core policy to inform allocations site selection to ensure consideration of key purposes and strategic functions, in making revisions under exceptional Circumstances.</p>			
1B		Impact on infrastructure (Including transport education and social)	Leeds, Kirklees, Calderdale , North Yorkshire (Highways and education provider) , Harrogate and Craven	<p>Local Infrastructure Delivery Plan</p> <p>Transport Study (SDG)</p> <p>Education plans</p>	<p>Sharing of evidence and information including updates to and content of the Infrastructure Delivery plan.</p> <p>Ensure LCR investment plan, growth Plan and implementation of Strategic Economic Plan support strategic growth areas.</p> <p>Detailed choice and Phasing of development sites in allocations DPD.</p> <p>Ongoing work with adjoining Councils in particular on Transport impacts and mitigation (see below) and on education implications and mitigation.</p> <p>Share information on High Level Aire Sewer with Craven.</p>	<p>Allocations DPD choice of sites for development and supporting infrastructure where required.</p> <p>Monitoring housing completions</p> <p>Monitoring and Updating infrastructure plan</p>	<p>Ongoing liaison and sharing of evidence. Need to identify and quantify specific infrastructure capacities, shortfalls and future requirements, linked to scale and phasing of development. Where necessary, development in Bradford may need to fund infrastructure improvements in adjoining Local authority areas and vice versa, via 106 Agreements or CIL receipts, where these are deemed necessary to support growth.</p> <p>Joint working through LCR LEP on strategic infrastructure delivery.</p>	Housing need
1C		Scale of housing provision/Meeting others needs	Leeds, Kirklees, Calderdale , Harrogate, Craven and North Yorkshire.	<p>Bradford District Housing Requirement Study, addendum report and 2014 update.</p> <p>Strategic Housing Market Assessment</p> <p>Emerging LCR housing reports on housing markets and objectively assessed need methodology</p>	<p>Plan proposes to meet Districts Objectively assessed needs to 2030, in full.</p> <p>There are no unmet needs from other LPAs which Bradford are currently being requested to consider meeting.</p>	<p>Annual Monitoring Report (AMR)</p> <p>Allocations DPD</p> <p>5 year supply delivery housing land</p>	<p>Review and assess when available LCR reports on objectively assessed housing need and strategic housing market areas.</p> <p>Ongoing liaison with adjoining councils.</p> <p>Leeds MD, through its Core Strategy &amp; Site Allocations plan, is planning to meet its own objectively assessed needs, within the district boundary and is not planning to meet any shortfall arising from neighbouring authorities.</p>	Housing need

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1D		Travellers and Travelling Show People Provision	Calderdale, Leeds, Kirklees, Wakefield, craven, Harrogate and North Yorkshire	West Yorkshire G & T Study 2008	Updated Local Study of Need in consultation with other councils. Align with methodology and approaches within LCR where appropriate and practicable.  Bradford District will meet its objectively assessed needs in full within Local Plan.	AMR Allocations DPD 5 year supply	Consult adjoining Councils on methodology and approach to update study and share findings.	
2	Scale and location of new land for employment	Potential to prejudice prospects for regeneration in neighbouring areas by diverting investment interest and infrastructure funding	Calderdale, Leeds, Kirklees, craven, Harrogate and North Yorkshire	Employment land study  Regional Econometric Model  Retail and Leisure Study ( 2013)  LCR Strategic Economic Plan	Share Retail and Leisure Study.  Joint working through Leeds City Region (LCR) Strategic Economic Plan (SEP)	AMR Allocations DPD	Ongoing work through the implementation of the LCR SEP  Need to considered detailed implications of site specific allocations in separate DPDs.	Jobs and infrastructure needed
3	Flood risk in main river corridors (particularly the Aire and the Wharfe)	Development increases flood risk in other areas down stream. In identifying land for development, need to avoid increasing flood risk further downstream and to assess feasibility of safeguarding areas to increase flood storage provision and improve defences.	Leeds, Selby, Craven, Harrogate, North Yorkshire.	Strategic Flood Risk Assessment (SFRA) Level 1  Sequential approach background paper  Infrastructure Delivery plan	River Catchment plans Links with local infrastructure plans and provision of blue/ green infrastructure. Site allocation DPD site choices. Use of Sustainable Urban Drainage Systems (SUDS) and work of SUDS approval body when in place	SUDS approval body implementation  AMR	On going discussion with Environment Agency in using the SFRA Level 1 and supporting statement on sequential approach to undertake the level 2 work as part of more detailed site allocating DPDs.  Need to maximise up stream mitigation of flood risk, in order to minimise any downstream implications.	The provision of infrastructure for flood risk
4	(Impact on South Pennine Moors SPA) Potential impacts of growth from individual districts and 'in-combination	(Adverse impact on South Pennine Moors SPA as a result of scale and location of new development.. Impacts of public use and access to	Leeds, Calderdale, Pendle, Kirklees and Harrogate. Natural England Potential impacts relate primarily to South Pennine Moors SPA and SAC, but also	Appropriate Assessment.	Need for sensitive choice of sites and broad locations for development in order to reduce potential for impacts. May be need for further HRA work in relation to individual sites. Managing and monitoring access	Need for better understanding of pressures for recreational use of uplands due to growth and likely increase in visitor numbers, particularly in relation to honeypot sites e.g Rombolds Moor. Joint work (involving Bradford,	Sharing HRA work and background with LPAs and key bodies. Liaise with them in developing further data and mitigation strategy in support of Local Plan. Ongoing work with Natural England on implementation of approach.	Conservation and enhancement of natural environment

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	impacts on European Sites	the moor as well as loss of supporting habitats and feeding grounds.) Bradford's HRA identifies a range of adverse impacts in relation to emissions, use for recreation, urban fringe impacts and potential for loss of supporting habitats.	to North Pennines and land between SACs and SPAs in North Yorkshire .		to the moors. Need to consider potential for identifying additional areas of habitat and/ or locations for recreation and funding mechanisms to support this. Buffer policy around SPA linked to criteria policy in Core Strategy. Consider potential for agreeing approach to overall management of visitor pressures on South Pennine Moors SPA/SAC with authorities adjoining site  Updated Local Development Scheme includes preparation of new Supplementary Planning Document on Management & Mitigation of impacts of development on South Pennine Moors SPA/SAC	Kirklees and Calderdale) in relation to bird monitoring is already underway. Early work is being evaluated as part of a rolling programme and will feed into further HRA and Local Plan work.		
5	Pressure on strategic transport network							
5A	M62/M621/M606	Potential for disruption of traffic flows and capacity issues on the M62 /M621/M606	Highways Agency	Highways Agency's modelling outputs. District Transport Assessment by SDG  Ongoing local modelling	LCR SEP investment Local Transport Plan (LTP) investment West Yorkshire Transport Fund Plus Liaison with Highways Agency	AMR	Work with Highways Agency to update their transport modelling data , share findings, identify network needs and funding opportunities.  Update Local Infrastructure Plan to reflect investment needs on Strategic Road Network.  Work with Highways Agency on Route Strategies to provide evidence on planned growth to inform Strategic Road Network investment planning.  Liaise with Highways Agency as develop detailed assessment methodology for site selection.  Ongoing work as part of LCR SEP to ensure coordination of supporting strategic transport investment	Provision of infrastructure
5B	A65	Potential for impact on traffic flows	Leeds North Yorkshire and Craven	SDG transport Assessment	LCR SEP investment LTP investment West Yorkshire Transport Fund Plus	AMR	Liaise with adjoining highways authorities to share corridor information and modelling as well as potential mitigation measures – linked to scale of proposed growth and site	Provision of infrastructure

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							specific allocations.	
5C	Pressure on local transport network:	Potential for impact on traffic flows	Craven, Calderdale, Leeds, Kirklees and North Yorkshire	SDG transport Assessment	LCR SEP investment LTP investment West Yorkshire Transport Fund Plus	AMR	Liaise with adjoining highways authorities to share corridor information and modelling as well as potential mitigation measures	
6	Windfarm development	Cumulative visual impact. Need to be able to assess cumulative visual impact plus potential impacts on protected bird species and to weigh these against case for renewable energy.	Calderdale, Kirklees, Craven, Burnley, Bury, Lancashire, Rochdale and Pendle Areas just outside the South Pennine Moors SAC and SPA, where wind speeds are still relatively high tend to come under greatest pressure.	Studies relating to landscape capacity supported by a number of authorities. Also Yorkshire and Humber Renewable Energy Study and equivalent for Lancs authorities.	A draft South Pennine Memorandum of Understanding on Renewable Technologies is currently being debated in the authorities that form part of the South Pennine Renewable Energy Working Group.	Memorandum proposes joint working in relation to setting up and sharing monitoring systems. Work has started on this.	South Pennine Renewable Energy Working Group ongoing liaison and sharing of information.	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
7	Minerals	Importation and supply of aggregate and cut stone including supply and wider interactions	Wakefield, Barnsley, Calderdale, Kirklees, Doncaster, Rotherham Leeds, Hull North Yorkshire Derbyshire	Draft of Local Aggregate Assessment (LAA) for West Yorkshire out for formal consultation Sep 2014..	Regional and Sub Regional liaison on minerals matters through Yorkshire and Humber Aggregates Working Party (Y&HAWP) and LCR.	Sub regional aggregates monitoring through LAA and Y&HAWP yearly report.	Liaison through the regional minerals meetings (Yorkshire and Humber Aggregates working Party) ; any issues rising under NPPF paragraph 146.1 to be addressed through LAA for West Yorkshire, Y&H AWP .  Liaison when developing detailed approach in Allocations DPD.	Provision of minerals
8	Green Infrastructure (GI)	Agreement on importance of GI in managing and mitigating impacts of growth and on strategic corridors and assets. including biodiversity networks.	Authorities within LCR supported Green Infrastructure Strategy North Yorkshire Local Nature Partnerships	LCR GI Strategy Regional work led by Natural England	Need to agree role and support for GI where strategic green belt is under particular pressure eg Leeds/ Bradford Corridor/ Tong Valley.  Share best practice in relation to defending green space within urban areas and applying multi-functional tests.	Application of NR standards for access to wider areas for informal recreation. Links with Habitat Regulations Work.	Ongoing liaison with adjoining councils and key bodies  Need to recognise the strategic & contiguous Green Infrastructure links with Leeds as identified via the Leeds Core Strategy & the need for such links to be maintained & enhanced.  Link to emerging Local Nature Partnerships	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. Provision of health infrastructure and other local facilities
9	Waste Management	Cross boundary movement of waste into Bradford and out of Bradford and wider	EA, adjoining LPAs plus others who take waste over 500 tpa. Includes Leeds, Wakefield, Calderdale	Waste arisings and waste treatment capacity update Assessment. Yorkshire and	To analyse recent data/ information and seek agreement of recipients of waste that they are planning to support the	AMR Regional and Sub regional waste liaison and updates of Yorkshire and Humber Waste Position Paper.	LCR Heads formalised the Yorkshire and Humber Waste Technical Advisory Body (Y&H WTAB) and MOU in July 2014 – at least 3 formal meetings a year and an annual report back to LCR on outcomes/work. Ongoing liaison	Waste Management



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		implications	, Kirklees. North Yorkshire CC, Sheffield, Nottingham, Trafford, North East Lincolnshire, Doncaster, Rotherham, Stockton-on Tees and Knowsley	Humber Waste Position Paper. (July 2014)	approach set out in the Waste Management DPD: Preferred Approach and Evidence Base. .		with other areas which currently take waste from Bradford.  Deal with detailed issues as part of the Waste Management DPD.	
10	Green Belt	Long term strategic function of Green belt	Leeds, Kirklees, Calderdale , Harrogate, Craven and North Yorkshire	Growth Study ( includes strategic assessment of green belt function around all settlements)  SHLAA	Core Policy seeks to ensure strategic function of green belt is maintained where revisions are made under policy SC7.  Plan seeks to establish green belt boundary for full plan period but given constraints of land supply and other environmental constraints is not proposing to allocate safeguarded land. The Long term extent of green belt will need to be addressed through subsequent plans comprehensively across the City Region.	AMR  Allocations DPD	Ongoing liaison with other LPAs on emerging plans and implications for scale and extent of green belt in City Region.  Minimise the overall need for green Belt release under exceptional circumstances by using non green belt land that is deliverable and suitable.  Proposed Core Strategy urban extension (linked to Holme Wood) in South East Bradford, will reduce the extent of the current green belt gap in a strategically important location between Bradford and Leeds. . The detailed implications of any change on green belt function and any revised boundary will be undertaken as part of Allocations DPD. This will also look at the detailed issues of any release for development, including appropriate landscaping & infrastructure etc. .  Longer term Green Belt issues across the City Region need to be addressed as necessary via the next generation of development plans.	Deliver homes