

Local Plan for the Bradford District

Core Strategy

Background Paper: 1. Overview (Updated)

December 2014

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## 1.0 **City of Bradford MDC**

- 1.1 The City of Bradford MDC is a large metropolitan authority which covers approximately 370 km<sup>2</sup> (143 sq miles) and forms one of the five districts within the West Yorkshire conurbation and plays a significant role within the wider Leeds City Region. It is home to a significant and diverse growing population. As the third biggest economy in the region it is a key location for business and major employers.
- 1.2 The 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.

## 2.0 **Evolution of the Plan**

- 2.1 Following the introduction of the Planning and Compulsory Purchase Act 2004 the Core Strategy has been in preparation since 2006. In this time significant changes have occurred at national, regional and local level, which have influenced the content and approach of the Core Strategy. The key stages in the evolution of the Core Strategy are set out below.

### **Replacement Unitary Development Plan**

- 2.2 Following the introduction of the PCPA 2004 the Council was still working towards the adoption of the Replacement Unitary Development Plan following a Public Inquiry in 2003, under the transitional arrangements. The Council received the Inspectors report in 2004, and published modifications in 2005. The RUDP was subsequently adopted in October 2005. This had a plan period to 2014. Under the transition provisions of the 2004 Act the policies were automatically saved for 3 years from adoption.
- 2.3 Subsequently, the Secretary of State issued a Direction on 30th September 2008 saving the policies beyond 31 October 2008 as proposed by the Council with one minor change. The Direction sets out the policies saved. The following policies, from within the Policy Framework volume of the RUDP, are as a result not saved:

UDP5 Needs of Communities in appropriate locations  
UR4 Sequential approach to accommodating development  
H1 Phase 1 Housing  
H2 Phase 2 Housing  
H3 Monitoring of housing supply  
H5 Residential development of land and buildings  
E3A Office development  
TM9 Protection of pedestrian and Cycle routes  
TM 3 On street parking controls  
TM21 Provision and protection of rail and freight facilities  
TM22 Lorry parking  
NE12 Landscape and wildlife enhancement  
NR6 Aggregate land banks  
NR14 Agricultural land

P4 Contaminated land  
P14 Biodegradable waste – land

2.4 The RUDP as saved is the current statutory development plan for the District.

#### **Local Development Scheme**

2.5 The first Local Development Scheme (LDS) for Bradford was prepared in consultation with Government Office for Yorkshire and the Humber (GOYH). The First Secretary of State approved the LDS on 21 June 2005 and it was subsequently adopted by the Council's Executive on 20 September 2005. The LDS included the following key elements:

- Core Strategy (DPD)
- Housing and Employment Sites and Safeguarded Land Allocations (DPD)
- Bradford Waste Management Plan (DPD)
- Bradford City Centre Area Action Plan (DPD)
- Proposals Map (DPD)

2.6 The priority work in the LDS sought to address the issues raised by the RUDP Inspector and endorsed by the First Secretary of State in his letter relating to the Modifications to the replacement UDP. The programme also linked to key local strategies and priorities including the Community Strategy. The LDS set out the programme for the 5 DPDs. As well as the Core Strategy the timetable prioritised the Waste Management DPD in order to meet national policy and European Waste Directives.

2.7 The GOYH wrote to all Local Planning Authorities in December 2006 encouraging them to review their LDS. In consultation with GOYH the Council reviewed the LDS. This took account of the following key issues:

- Slippage on milestones
- Emerging work on Regional Spatial Strategy
- Changes in national guidance
- New local work in key regeneration priority areas including the Airedale Masterplan, and the Bradford Canal and the Canal Road Masterplan

2.8 The key changes included:

- Amalgamating the two allocations DPDs into a single allocations DPD dealing with housing, employment, safeguarded land and additionally open space and recreation;
- Addition of a new AAP to deal with the Canal Road Corridor priority regeneration area;
- Revisions in the timetable to take account of slippage in Core Strategy and RSS, and to ensure better links to the other DPDs to ensure conformity;

2.9 The revised LDS was adopted in March 2007.

2.10 The revised LDS was reviewed in 2014 in light of recent national planning reforms, progress on the Local Plan, Local Circumstances and implications of Neighbourhood Planning. An updated LDS was approved by the Council's Executive held on 22 July 2012. This reaffirmed the package of Local Plan Development Plan Documents to be produced as set out above with an updated timetable. It also set out a revised list of Supplementary Planning Documents to be produced in support of new Local Plan.

2.11 The Updated LDS also sets out an update on Neighbourhood planning.

### **Core Strategy Milestones**

- 2.12 Work on the Core Strategy commenced in early 2005 and continued through 2006 with evidence gathering and work on the Community Strategy review and 2020 Vision refresh consultation September – December 2005.

#### Developing Issues and Options

- 2.13 The Issues and options engagement took place in early 2007. It followed on from key supporting work on the following:
- Updated Bradford Vision 2020 Bradford District Community Strategy 2006-09 (March 2006)
  - Draft Regional Spatial Strategy for Yorkshire and the Humber (consultation January –April 2006, Examination September-October 2006)
  - Local Area Conferences (June/July 2006)
  - Leeds City Region Development Plan (November 2006)
  - Developing the robust evidence base (Urban Potential Study/Open Space Assessment/Local Housing Assessment)
- 2.14 The Council published 8 topic papers setting out the Core Strategy Issues and Options for discussion from February through to June 2007. Further key supporting work streams in 2007 included:
- Bradford District Sustainable Community Strategy 2007-10
  - Draft Regional Spatial Strategy for Yorkshire and the Humber (Panel report July 2007 Proposed Modifications September 2007)
  - Developing a robust evidence base (Urban Potential Study/employment land study /Local Housing Assessment/Retail Assessment)
- 2.15 The Council considered the comments received to the Issues and Options consultation. A number of respondents including those from the Government Office for Yorkshire and the Humber (GOYH) requested that further work was required in order to develop more fully key elements of the issues and options in advance of preferred options. In particular the need to explore a more spatial vision and realistic and spatially specific options for the location of development in line with the then emerging Regional Spatial Strategy (RSS).
- 2.16 The Secretary of State issued proposed modifications to the Yorkshire and Humber Regional Spatial Strategy in September 2007. These raise a number of significant issues, which had implications for the Core Strategy including a significantly higher housing requirement for the district. The Final RSS was adopted in May 2008.
- 2.17 The Further Issues and Options papers were produced in order to take account of some of the critical comments raised in the earlier consultation and also take into account more recent evidence and changes in national, regional and local strategies in particular the RSS and the Sustainable Community Strategy (SCS). The Further Issues and Option papers set out a revised spatial vision and objectives as well as refined and amended spatial options (4 options in total) for the location of development.
- 2.18 The Further Issues and Options were published for consultation from February 2008 to May 2008. Additional engagement was undertaken with communities in areas proposed in the Further Issues and Options as areas for significant growth, such as Holme Wood.
- 2.19 In response to the governments new guidance issued in June 2007 on the waste content of Core Strategies a Further Issues and Options report on waste management was issued for comment in November/December 2008.

- 2.20 Following a review of the consultation on the earlier Minerals Issues and Options paper issued in 2007, it was felt that further targeted consultation was required to ensure a robust engagement from the minerals operators and interests. An updated version of the Issues and Options topic paper was issued for comment in November/December 2008 and further targeted engagement undertaken with Minerals Industry and interests.
- 2.21 Work on the Core Strategy in 2009 and 2010 focused on developing the evidence base on which to inform and develop the Core Strategy. These included key studies such as the Strategic Housing Market Assessment (SHMA), Strategic Housing Land Availability Assessment (SHLAA) Affordable Housing Economic Viability Assessment (AHEVA), Infrastructure Plan, and the Transport Assessment.
- Testing the Preferred Option
- 2.22 The Council prepared a Preferred Option style document which set out the draft strategy and policies together with the consideration of the options considered and the comments received from the public and partners earlier in the process. This report was entitled the Core Strategy Further Engagement Draft and was published for consultation period on 28 October 2011 for 12 weeks.
- 2.23 The Core Strategy Further Engagement Draft set out the proposed approach to managing development and change to 2028, based upon the research and community engagement and consultation to that date. It also took into account the emerging reforms to national planning policy including the Draft National Planning Policy Framework (NPPF). The approach was based upon development strategy as set out in RSS including the Housing requirement.
- 2.24 Following the above consultation the Council considered the representations received but also reviewed the document and comments in light of the final published NPPF, issued in March 2012. In response to the NPPF and representations further evidence studies were undertaken. These included:
- Housing Requirement Study
  - Viability Assessment of Local Plan Core Strategy FED
  - Growth study
  - Infrastructure Plan Update
  - Strategic Housing Land Availability Assessment (SHLAA) Update
  - Strategic Housing Market Assessment (SHMA) Update
  - Retail and Leisure Study Update
- 2.25 Further informal engagement was undertaken with key stakeholders in developing the updated evidence base and also on revisions to the Core Strategy.
- 2.26 The Publication Draft was drafted taking account of the representations, Updated Evidence and NPPF. It also reflected ongoing work with other key bodies under the duty to cooperate. It was approved by Full Council for submission on 10 December 2013.
- Publication Draft
- 2.27 The Publication Draft was issued for formal comment in February and March 2014 together with the supporting evidence and related background papers. The Statement of consultation sets out the details of the consultation and the summary of main issues together the Councils response.
- 2.28 In response to representations received as well as changes in circumstance further technical work and updates to existing work has been undertaken prior to submission as well as further work in order to meet the duty to cooperate in advance of submission. These include:

- Housing Requirement Update  
Core Strategy Publication Draft (2014)  
Background Paper 1: Overview (Update)

- Viability Assessment of Core Strategy Publication Draft
- Local Infrastructure Plan updates (ongoing)
- Habitats Regulation Assessment Update
- Gypsy and Traveller Accommodation Needs Assessment (ongoing)

#### Housing Requirement Update

- 2.29 The Council commissioned Edge Analytics to update the core scenarios within the Bradford Housing Requirements Study (HRS) carried out by consultants GVA and Edge Analytics in 2013.
- 2.30 The update was to implement the Bradford specific recommendations of the report by Edge Analytics entitled 'Leeds City Region – Demographic evidence for the objective assessment of housing need within the Leeds City Region' (May 2014). That study has carried out an assessment of all the work carried out thus far by local Authorities in the City Region in support of the housing need assessments. Edge Analytics found the Bradford work carried out in 2013 to be broadly sound but recommended a number of updates in the light of new data and [projections published since 2013.
- 2.31 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'.
- 2.32 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.
- 2.33 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.
- 2.34 For clarity the different conclusions of the 3 iterations of the housing requirement study are presented in Table 1 below

Table 1 Summary of Conclusions of iterations of the Housing Requirement Study

	Demographic Projections Used	Household Projections Used	REM Run & Jobs Growth Used	Recommendation (dwellings per annum)
<b>HRS February 2013</b>	2010 based SNPP	2008-based	April 2012 1,591 / annum	Towards the top of the range of : 2,565 (Employment-led scenario) and; 2,210 (Re-based 2010 SNPP scenario)
<b>HRS August 2013</b>	2010 based SNPP	2008 based & Interim 2011 Based	April 2012 1,591 / annum	The mid point of two employment led scenarios: 2,565 (using 2008 based household formation rates) and; 1807 (using 2011 based household formation rates)
<b>Scenario Update Sept 2014</b>	2012 based SNPP	2008 based & Interim 2011 Based	June 2014 1,604 / annum	No specific recommendation made: Updated scenario outcomes as follows: 2,307 (Employment led / 2008 based household formation rates) 1,532 (Employment led / 2011 based household formation rates) 2,039 (SNPP 2012 based / 2008 based household formation rates) 1,532 (SNPP 2012 based / 2011 based household formation rates)

#### Viability Assessment

- 2.35 The Council commissioned consultants DTZ to undertake an economic viability assessment study to ensure viability and deliverability of policies and proposals in the Local Plan Core Strategy. This was an iterative process which assessed the Core Strategy Further Engagement Draft (2011) and the Core Strategy Publication Draft (2014) policies in light of latest updated viability information.
- 2.36 The Viability Assessment of the Core Strategy Publication Draft recognises that development viability varies hugely across the Bradford District due to market conditions. There are some areas of the Bradford District which are able to withstand many of the policies and standards whilst other areas of the Bradford District are struggling to make development viable even with no additional policy costs. The assessment concluded that whilst there were still viability challenges the policies as now drafted in the Core Strategy complied with NPPF and the National Planning Practice Guidance and allowed for sufficient flexibility over the plan period with the 'subject to viability' review mechanism.

#### Gypsies and Travellers Assessment

- 2.37 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 Show people in Bradford District are sound, the Council has commissioned an update assessment and this is being undertaken by ARC4. There are 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 Show people;
  - 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
- 2.38 The Conclusions of this work will be made available prior to the examination and may require a minor change to the headline pitch requirements as part of examination process. Initial draft conclusions are not suggesting that a significant change to the pitch figures in Policy HO12 will be required.

### **3.0 Strategic Planning and Duty to Cooperate**

- 3.1 The Regional Spatial Strategy (RSS) for Yorkshire and the Humber (adopted May 2008) provides 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.
- 3.2 As part of the Governments planning reforms the RSS as part of the development plan was removed from being part of the development plan in the Localism Act. The Secretary of State revoked the Yorkshire and Humber RSS .in 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.
- 3.3 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. Guidance on this is contained in the NPPF. Leeds City Region Leaders agreed the approach to be adopted to facilitate this at their meeting on 6 December 2012.
- 3.4 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.
- 3.5 In addition, it committed to the pursuit of joint approaches to technical work whenever this is practical and ensure alignment of approaches and methodologies where joint working was not possible or appropriate.
- 3.6 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.
- 3.7 A separate Duty to Cooperate Statement has been produce which sets out in more detail how the Council has discharged the legal requirements in relation to the Core Strategy prior to submission.

### **4.0 Style, content and structure of the Core Strategy**

- 4.1 The Core Strategy structure and approach has evolved through the preparation process in response to both local circumstances and changes in national legislation and guidance. The approach has evolved from a 'pure' Core Strategy to a document

which, as well as, setting out the key development strategy also includes a range of more detailed thematic and development management policies.

- 4.2 The Council has considered the guidance in paragraph 153 NPPF which requires a local plan to be produced for the whole of its area with the preparation of additional DPDs only where justified. To this end, the Council is committed to continue the preparation of a suite of documents given the progress to date. It is considered that to change direction to produce a single Local Plan at this time would end in further delay in putting in place a clear strategic framework to guide sustainable development in the District. The Core Strategy as proposed seeks to provide clarity and certainty on key strategic priorities as set out in paragraph 156 of NPPF. In particular the scale and distribution of development especially to meet housing need which is critical given the revocation of RSS.
- 4.3 In line with paragraph 157 of NPPF the Core Strategy seeks to establish a development strategy for the period 15 years from adoption. Previous plans have planned for a 10 year period with a 5 year supply of safeguarded land. In setting an approach through to 2030, the Council recognises the need to boost the supply of land for development in particular Housing. However, in contrast to the previous plans for the District the Longer plan period has implications for the Green Belt which need careful consideration. Given the Districts environmental and land supply constraints, there is a the need for a wider strategic green belt review in the LCR in the longer term through future local plan reviews to reconsider the strategic green belt function and also scale and distribution of longer term development needs. As a result Council do not deem it appropriate and necessary at this time to allocate safeguarded land in line with paragraph 185. The Core Strategy will establish a Green belt which will last beyond the plan period as required by paragraph 183 of NPPF. This is based on meeting the development needs in full within the plan period with the contribution of windfall within the plan period ensuring that the land supply will last beyond the plan period.
- 4.4 The document is made up of 7 chapters with sub sections as follows:
- 1) Introduction
  - 2) Plan context
  - 3) Vision/Objectives/ Core Policies
  - 4) Sub area policies
    - Regional City of Bradford including Shipley and Lower Baildon
    - Airedale
    - Wharfedale
    - South Pennine Towns and Villages
  - 5) Thematic Policies
    - Prosperity - Economy and Jobs, Transportation and Movement
    - Housing - Planning for People
    - Planning for Places – Environment/Minerals/Waste/Design
  - 6) Implementation and Delivery
  - 7) Monitoring and performance
- 4.5 Section 1 sets out the introduction including purpose of Core Strategy and links to other parts of the Local Plan. In this respect the Core Strategy sets out the key strategic policies including the development strategy but also includes a range of other thematic policies to provide a more comprehensive Policy coverage in line with NPPF. The further Local Plan Documents will deal with site specific allocations and any more detailed policies linked to the allocations.
- 4.6 Section 2 sets out the context for the document including work undertaken to support the document including engagement and technical studies and assessments. It sets out the key strategy linkages and the spatial portrait of the key issues and challenges which have shaped the core approach and which the Core strategy needs to address.

- 4.7 Section 3 sets out the spatial vision to 2030 and supporting plan objectives, together with the Strategic Core Policies.
- 4.8 The spatial vision is founded upon the Council's Community Strategy and the key issues, challenges and opportunities facing the District as highlighted in the recent Understanding Bradford District Report. The plan objectives which follow on from the Spatial Vision establish the key means of how it is to be achieved. The Strategic Core policies then set out the key policy elements in support of the vision and objectives. The subsequent sections then provide more detail on how these will be achieved. The Strategic Core Policies cover the following broad areas:
- Overall approach and key spatial priorities
  - Climate change and resource use
  - Working together
  - Hierarchy of settlements
  - Location of development
  - Green infrastructure
  - Green belt
  - Zones of influence for the South Pennine Moors SPA
  - Making great places through good design
- 4.9 At the heart of the NPPF is the presumption in favour of sustainable development. In order to embed this into the Core Strategy a high level policy P1 is included which is based upon the Planning Inspectorate model suggested policy with a minor change to reflect local circumstances.
- 4.10 Section 4 sets out sub-area policies. These relate to the following broad areas:
- City of Bradford, including Shipley and Lower Baildon
  - Airedale
  - Wharfedale
  - South Pennine Towns and Villages
- 4.11 The sub areas reflect broad areas which have a broad functional relationship and identity. These policies set out the scale and broad distribution for development and change (homes and jobs) within each sub area including settlements, together with how key environmental assets, both built and natural, will be managed. It also seeks to identify key areas of infrastructure, in particular transport, which will require improvement in support of the development strategy and other investment priorities. They include a supporting sub area spatial vision for each place by 2030. The section seeks to provide certainty to local communities and support any preparation of Neighbourhood Plans.
- 4.12 Section 5 contains the thematic policies. These are organized into three themes, namely Planning for Prosperity, Planning for People and Planning for Place.
- 4.13 The focus under Planning for Prosperity is to support sustainable economic growth and job creation. This has been drafted to compliment the District Economic Strategy and reflect the issues and evidence within the Local Economic Assessment. It covers supporting measures to create jobs, protect existing economic assets, and provide new supply of the right land in the right places in order to support the commercial property markets. This has been informed by the Employment Land Study and its subsequent update. The section also sets out the approach to supporting successful and viable city, town and district centres, informed by the updated Retail and Leisure study.
- 4.14 The first theme also includes Transport and Movement. It contains proposed policies on travel reduction and modal shift, public transport, cycling and walking, parking

policy and freight. The Accessibility Criteria have been agreed in partnership with West Yorkshire METRO.

- 4.15 The second theme under Planning for People focuses on housing. The Housing Requirement Study shows that the District is facing a rapidly growing population with increases across all age groups. This in turn is placing increasing pressure on the existing housing stock. One of the biggest challenges for the Core Strategy is therefore to plan to meet the housing needs of this growing population in a sustainable way which assists regeneration while minimising the impact on the environment.
- 4.16 The Housing section therefore includes a range of policies which set out the overall target or requirement for housing over the plan period, how that housing should be distributed across the different parts of the district, and policies to ensure that the right amount of affordable housing is secured, the quality and type of housing is appropriate to the needs of the community and new provision for gypsies, travelers and travelling show people. The overall aim is to plan positively for a very significant level of growth and uplift in housing delivery but to do so in a sustainable way. There are therefore a number of additional policies geared towards managing growth and securing the most sustainable outcomes including policies relating to prioritising the development of previously developed land and buildings, securing the efficient use of land via a density policy and phasing land release. In each case care has been taken to ensure that policies are drafted in such a way as not to compromise delivery in particular to ensure that a 5 year land supply can be maintained. The policies aimed at managing growth have performed particularly strongly and positively when tested within the Sustainability Appraisal.
- 4.17 Within the housing section, Policy HO3 sets out the distribution of housing growth and follows the settlement hierarchy with the focus of development being in the City of Bradford, followed by the Principal Towns of Bingley, Ilkley, and Keighley and then the Local Growth Centres of Queensbury, Silsden, Steeton with Eastburn and Thornton. Individual housing targets are indicated on a settlement by settlement basis. Setting targets at settlement level within the Core Strategy will help speed up the process of preparing the Allocations DPD and will provide a framework for any local communities who want to produce their own Local Neighbourhood Plans.
- 4.18 Access to housing is an issue for many communities and the proposed approach includes reflects the advice of the SHMA update which suggests that District between 20 and 25% of new homes should be affordable. This suggested target has been tested in terms of economic viability through the Affordable Housing Economic Viability Assessment (AHEVA) and the Local Plan Viability Assessment. The result is a flexible and variable approach with different affordable housing targets for different sub areas of the district based on a combined analysis of need and viability. The Core Strategy also includes positive policies to drive up housing quality with reference to the Lifetime Homes and Code for Sustainable Homes standards, to address the problems of overcrowding in existing communities, and to reduce the number of empty homes.
- 4.19 The final theme, Planning for Place, includes a wide range of policies linked to quality of life issues for residents and ensuring that the district remains attractive for visitors. To achieve this policies aim to; protect open space and recreation facilities and achieve improvements to meet the needs of a growing population, protect, manage and enhance biodiversity assets, moving from a position of net loss to net gains for nature, conserve and enhance the districts historic environment, requiring development to respect assets and safeguard and enhance the character of local landscapes, in circumstances where Greenfield land is needed for development Policies encourage the provision of renewable and low carbon energy, while requiring assessment of potential adverse impacts, seek to reduce flood risk and adopt a positive approach to water management and require that known environmental risks

and the sensitivity of proposals to adverse effects from pollution be taken into account.

- 4.20 It includes a set of policies relating to minerals which seeks to ensure protection of key minerals. Two policies seek to set the strategic policies for the management of waste which link to the Waste management DPD which seeks to deliver the appropriate level of waste management facilities during the plan period.
- 4.21 The final set of policies within this section are all new and seek to ensure good design is at the heart of development and growth.
- 4.22 Section 6 sets out policies to support the delivery of the above policies. It includes policies on the role of the other DPDS and AMR, Developer contributions (Sec 106 and Community Infrastructure Levy), Working with partners and communities, methods and tools to support development (Local Development Orders etc) and possible approaches to funding and delivery. In light of Plan Viability Assessment it includes a new policy on development viability.
- 4.23 The final section sets out the proposed monitoring framework for the plan and its policies and the links to both the AMR and corporate/District performance systems which has been revised to provide a more focused approach.

## **5.0 Relationship with the other DPDS**

- 5.1 The Council will deliver the vision, objectives, core policies, thematic policies and the sub area planning policies as presented in this Core Strategy through the use of separate development plan documents. The Core Strategy sets out the parameters for the more detailed site specific DPDs. The two AAPs for the key priority regeneration areas have been progressed at similar timeframes to the Core Strategy. Bradford City Centre Area Action Plan DPD – will include regeneration focussed area based policies and proposals to help stimulate development and support land assembly through Compulsory Purchase Order (CPO). Shipley & Canal Road Corridor Area Action Plan DPD – will support the work of the Joint Venture Company established by the Council and Arnold Laver Group to deliver proposals for an urban eco settlement between Shipley Town Centre and Bradford City Centre.
- 5.2 The Allocations DPD will pick up the rest of the District in terms of more detailed allocations and designations required to meet the approach set out in the Core Strategy. It will specifically ensure the supply of deliverable housing sites for the plan period in line with the Core Strategy. The proposed scale and distribution of housing growth is such that the inclusion of Strategic Sites in the Core Strategy is not considered to be appropriate. As outlined in the relevant policies, housing growth is linked to delivery across the District in relation to the scale and characteristics of the identified settlement hierarchy.
- 5.3 The Allocations DPD will also allocate land to meet the needs for new employment land and where necessary community facilities and infrastructure.
- 5.4 In order to meet the development needs the Core Strategy recognises the need for a selective review of the Green Belt to accommodate the development needs which cannot be met elsewhere outside the current Green Belt. The Allocations DPD will selectively review the Green belt in line with the development strategy and policies of the Core Strategy. In so doing it will establish a boundary which can last beyond the plan period.
- 5.5 The Allocations DPD is programmed to commence testing the site options later in 2014 off the back of an updated SHLAA and a submitted Core Strategy. It is anticipated that it would be adopted in 2016.

## **6.0 Neighbourhood Planning**

6.1 Prior to the introduction of the Localism Act, the Council has a long track record of supporting communities in the preparation of local documents including Neighbourhood Design Guides and Village Design Statements.

6.2 Recently the Council approved several Neighbourhood Development Plans (NDP) prepared in advance of the Localism Act provisions which have engaged communities in the future shape of their areas. These are:

Holme Wood and Tong  
Barkerend, Beech Grove, Bradford Moor, Thornbury, Woodhall and Laisterdyke  
Manningham

6.3 These have also informed the work on the Local Plan, in particular the Holme Wood and Tong NDP which explored the potential for an urban extension in support of the wider long terms regeneration of the Holme Wood estate.

6.4 Following the enactment of the Localism Act the Council has been working with communities who are interested in taking forward Neighbourhood plans. Initial work has been to support neighbourhood area applications of which 4 have been published for comment and approved by the Council. These are for the following Parish Council areas:

- Ilkley
- Burley in Wharfedale
- Haworth, Cross Roads and Stanbury
- Oxenhope
- Menston
- Steeton-with-Eastburn, in conjunction with Silsden
- Wilsden

6.5 At present the Council is exploring with each of the respective Parish Councils the scope in terms of content and the timescales for their preparation for each of the Neighbourhood plans. At present it is unclear what the implications are for the Local Plan.

6.6 Several other Parish Councils are also actively exploring the possibility of preparing a Neighbourhood Plan, with a further Neighbourhood Area Applications having been submitted by

- Cullingworth

6.7 As noted above the Core Strategy through its sub area policies seeks to establish clear what is expected of each sub area and settlement. This will provide a clear start point for the preparation of any Neighbourhood plans.

## **7.0 Evidence Base**

7.1 The NPPF and the national guidance it superseded set out clear requirements in relation to the need to base the chosen approach of the Local Plan on the most up to date evidence. In the preparation of the Core Strategy a range of evidence has been used to inform the approach at each key stage reflecting the relative stage and content of the document. Each of the key

pieces of evidence and how it has informed the content of the Core Strategy is set out in Appendix 2.

## **8.0 Sustainability Appraisal (including Strategic Environmental Assessment)**

8.1 As required by Section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) has been an integral to the evolution of the Core Strategy. In meeting the requirement the work has also addressed the requirements of the European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the Strategic Environmental Assessment (SEA) Directive. The SA seeks to assess the likely impacts of the policies and proposals of the relevant plan. Early stages of SA were undertaken internally by the Council. The later stages of the SA have been undertaken by independent consultants AMEC (formerly Entec). Early stages of the SA were undertaken internally by the Council. Key stages prior to Publication Draft include:

- Scoping
- Issues and options initial SA (CBMDC - February 2007) -
- Further issues and Options initial SA (CBMDC - January 2008)
- Further SA of Issues and Options (Entec - March 2009)
- Interim Sustainability Appraisal Report - Further Engagement Draft (AMEC September 2011)

8.2 The SA of the publication Draft has been issued as required as part of the Regulation 19 engagement.

## **9.0 Habitat Regulations Assessment**

9.1 Under 'the Habitats Regulations', the Council is required to undertake an Assessment of the policies and proposals in the plan, to ensure that these would not lead to adverse effects on the ecological integrity of internationally important habitats or species within or close to the District; particularly in relation to the South Pennine Moors. An initial draft report, May 2013, concluded that the development proposed in the Core Strategy as configured at the Further Engagement Draft stage, could have adverse effects on the protected habitats and associated birds due to the extent of development located close to the moors and through increases in population. Effects were likely via the following impact pathways:

- Loss of supporting habitats
- Increased emissions to air from road traffic
- Wind turbines (collision risk, displacement)
- Recreational impacts (disturbance, trampling/erosion, fire, dog fouling)
- Urban edge effects (cat predation, fly tipping/ invasive species, scavengers)

9.2 A full Habitats Regulation Assessment (HRA) was undertaken by Urban Edge consultants. As part of this, further survey work was undertaken to inform the Publication Draft and the HRA.

9.3 The Publication Draft was supported by the full HRA (February 2014).

9.4 Representations were received to the publication Draft which raised areas of concern with the HRA. The Council has undertaken further work with its consultants Urban

Edge in consultation with Natural England in order to address some of the issues raised at Publication Draft stage.

9.5 In particular this further work has sought to:

1) clarification of advice relating to use of "breeding bird assemblage" which includes curlew and lapwing, as a qualifying feature;

2) less reliance on "typical species" in body of HRA based on NE advice subsequent to July meeting;

3) expansion of "in-combination" effects particularly with regard to Leeds Core Strategy Publication Draft;

4) further detail on scope and rationale for habitat and bird surveys undertaken in 2013;

5) expansion on "recreational impacts" section to include further evidence from South Pennine relevant research;

6) insertion of further analysis of visitor survey levels and patterns of use to show estimated number of visits, penetration distance into SPA by visitors;

7) explanation of use of 7km (85th percentile) cut-off point for distance travelled to visit SPA;

8) clarification of how the rate, scale and spatial distribution of development was altered in relation to the impact pathways identified - also references the updated SHLAA, Bradford Growth Study and Sustainability Appraisal;

9) distinction drawn between data used to inform the strategic level of decision making (i.e. Core Strategy) and the proposed Allocations DPD which will draw on further more focused survey data; and

10) review and improvement of conclusions to ensure a clearer statement that impacts of Publication Draft CS have been avoided/can be mitigated.

9.6 A revised HRA report has been produced in support of the submission of the Core Strategy.

9.7 A number of representations have been made at Publication Draft stage which suggest that the HRA does not provide adequate justification for the reduction in housing targets in certain settlements, most notably within Wharfedale. Having worked closely with Natural England and having reviewed the Revised HRA report which supports Core Strategy submission, the Council consider that the need to reduce housing targets in areas where housing land will be required within the proposed 2.5km zone is clear. However it may be useful at this stage to set out the process by which the Council analysed SHLAA site data and the results of the bird and habitats surveys of Spring / Summer 2013.

9.8 The need to derive a revised housing distribution (in all settlements not just Wharfedale) in the CSPD depended not only on the HRA but also on a range of other factors including:

- A revision to the total district wide housing target – as a result of an updated objective assessment of housing need and updated evidence, the CSPD proposed a small reduction in the total housing target as compared to the CSFED. Thus even without considering any other factors an identical



proportionate distribution of the district wide housing target would have resulted in a small reduction in the housing targets for the Wharfedale settlements;

- Consideration of updated evidence, in particular the SHLAA. The updated SHLAA showed a significant uplift in total district wide capacity for a number of reasons which are explained in the Housing Background Paper. This was significant in that capacity within the main urban areas of Bradford were significantly higher and there were more potential distribution choices available to the Council on land supply grounds than was the case at the time of preparation of the CSFED. The growth areas of Menston and Burley in Wharfedale were, for example, identified in the CSFED not only because of their relatively sustainable locations for some growth but also because of the constraints on allocating a higher proportion of the district wide housing requirement to the regional city.

- 9.9 Having said all of this, as far as Wharfedale was concerned, the potential direct and indirect impacts of the CSFED's housing proposals on the SPA and its 2.5km buffer zone was the main driver for the changes eventually incorporated within the CSPD.
- 9.10 It is worth reiterating the original concerns of Natural England. This was that due to evidence of feeding distances of Pennine Moorland SPA birds beyond the site boundary (up to 2.5 km), the HRA should include evidence that the housing targets for settlements within this distance can be delivered within the subsequent allocations development plan. If sufficient sites, without feeding habitat or evidence of SPA birds were not available, the Core Strategy's housing distribution may not be deliverable.
- 9.11 This advice led directly to the commissioning of bird and habitat survey work during the spring and summer of 2013 to ascertain where bird instances and feeding / supporting habitats were located and thus allowing a comparison of these locations with the potential land supply (SHLAA sites) within the 2.5km zone.
- 9.12 The work which combined the data from the SHLAA Update and the bird and habitat surveys and which was aimed at determining whether a re-distribution was required was carried out as explained within the Core Strategy and the Housing Background Paper 2 Part 1.
- 9.13 The aim of this work was to assess whether the previously proposed housing targets within the CSFED could still be met from SHLAA sites after any SHLAA sites which coincided with bird sitings or habitats were removed / discounted from the SHLAA capacity totals for that settlement.
- 9.14 This was a precautionary approach as consultants acknowledged that the presence of such sitings and habitats would not necessarily render a site as unsuitable for development. More detailed impact assessments would need to be carried out as part of the Allocations DPD and potential management and mitigation measures assessed.
- 9.15 The point however is that by carrying out the assessment indicated above – and discounting sites from the assumed settlement capacity - it could be proved whether each settlement's housing targets could, if required, be sourced from sites which would not have direct impacts due to the loss of these supporting areas.
- 9.16 In more detail the work involved the following:
- For each settlement within or partially within the 2.5km buffer zone - comparing the mapping of bird sitings and supporting habitats with mapping of SHLAA sites; note the SHLAA sites assessed were the ones which were within the SHLAA trajectory and considered deliverable or developable as the targets in the CSFED where in the main based on capacity of sites within the trajectory and not on any capacity from currently undevelopable sites;
  - Discounting those SHLAA sites where the survey work had found bird sitings or habitats.

- Where sites had been discounted, re-calculating the capacity of deliverable and developable land for that settlement;
  - Comparing the revised settlement capacity data with the CSFED Policy HO3 targets to reveal any settlements where either:
    - Revised capacities were now below proposed CSFED housing targets;
    - Revised capacities close to proposed CSFED housing targets.
- 9.17 The resulting data summarised in the table below shows that if the precautionary principle was followed, then there was a clear need to reduce housing targets in the settlements of Ilkley, Burley in Wharfedale, and Silsden since in these settlements the discounting of those sites which coincided with bird recordings or habitats resulted in settlement capacities lower than the CSFED housing targets.
- 9.18 The Ilkley target was reduced to a little below the remaining discounted capacity of 900 in part because it was assumed that it will, as the Principal Town within Wharfedale, also have to accommodate other uses such as new employment land (see Policy EC3) and education facilities.
- 9.19 In other areas the results were marginal with discounted settlement capacities only a little above CSFED targets. Oakworth is one example. It could be argued that there was also a HRA related justification to reduce these targets since further land capacity could also be lost at Allocations DPD in order to provide for other uses such as employment, schools, and open space including Suitable Alternative Natural Greenspace's (SANGs).
- 9.20 There were also instances where large and significant clusters of birds or habitats were recorded close to but beyond SHLAA boundaries. Menston was one such example.
- 9.21 A precautionary approach was also taken in Addingham – here the overall discounted capacity, although very significantly reduced, still lay above the CSFED housing target. However in this case account was also taken of the following factors:
1. The large cluster of recorded birds just to the south of the settlement;
  2. The overall recommendation of the HRA to reduce housing numbers in areas close to Rombalds Moor on account of potential direct and indirect impacts;
  3. Finally and most significantly Addingham's relative sustainability, its position in the fourth tier of the settlement hierarchy and the increased developable supply within the Regional City in the second SHLAA which allowed a modest redistribution away from fourth tier settlements;
- 9.22 Overall the reductions in housing targets for Wharfedale, on the back of both HRA and other sustainability factors, were rightly focused proportionately more on the lower fourth and third tier settlements (as opposed to Ilkley, a relatively more sustainable location where an argument could be made that housing demand and housing need is greater).
- 9.23 Based on this analysis the Council suggests that the housing re-distribution relating to the Wharfedale settlements and informed by the HRA together with other factors was clearly justified and therefore sound.
- 9.24 Finally it should be pointed out that the revised HRA report published at submission has reaffirmed the validity of the preliminary conclusions of the February 2014 HRA that the proposed number of new homes in the CSFED in the area around Rombalds Moor i.e. Wharfedale should be reduced.

Table 2 Housing Requirement Assessment Housing Distribution Summary Analysis

	SHLAA 2 Capacity*	SHLAA Site / Birds & Habitats Comparison	Revised Settlement Capacity	CSFED HO3 Target	CSPD HO3 Target	CSFED to CSPD Reduction	
						No of SHLAA Sites Affected	No
<b>Ilkley</b>	1,789	5	929	1,300	800	500	38
<b>Burley</b>	1,094	3	407	500	200	300	60
<b>Menston</b>	1,166	1	981	900	400	500	56
<b>Addingham</b>	1,153	1	722	400	200	200	50
<b>Silsden</b>	2,025	3	1031	1,700	1000	700	41
<b>Keighley</b>	5,233	0	5,233	5,000	4,500	500	10
<b>Oakworth</b>	495	2	289	250	200	50	25
<b>Haworth</b>	695	0	695	600	500	100	17
<b>Oxenhope</b>	50	0	50	150	100	50	33
<b>Denholme</b>	848	0	848	450	350	100	22
<b>Bingley</b>	2,196	1	1,753	1,600	1,400	200	13
<b>E Morton</b>	300	1	251	150	100	50	33
<b>Thornton</b>	863	0	863	700	700	0	0

\*SHLAA capacity totals only include deliverable or developable sites. Sites already ruled out as either unsuitable, unavailable or not achievable are not included in SHLAA capacity totals for each settlement.

\*No of SHLAA sites affected – this indicates number of sites which are in the SHLAA trajectory where there were recorded birds or habitats. A limited number of further non trajectory SHLAA sites did co-incide with recorded birds and habitat.

## 10.0 Equalities Impact Assessment

- 10.1 The Core Strategy has been the subject of an Equality Impact Assessment at key stages of its development in order to assess the potential impacts on key protected groups. An initial EqIA was undertaken to assess the Further Engagement Draft and involved a working group of equalities professionals as well as Local Plan officers.
- 10.2 An update to the EqIA was undertaken in support of the Core Strategy Publication Draft which is available as part of the consultation background papers.

## 11.0 Health Impact Assessment

- 11.1 As part of ongoing liaison and joint working on the Local Plan, the NHS Bradford and Airedale Public Health Directorate agreed, in April 2012, to produce a Health Impact Assessment (HIA) of the Core Strategy Further Engagement Draft (CSFED) to inform the preparation of the Core Strategy Publication Draft (CSPD).
- 11.2 In April 2013 the public health function was transferred from the NHS to the Council, and the HIA was completed by the Department of Public Health in October 2013.
- 11.3 The document examines the likely health impacts that the implementation of the proposed CSFED would bring to the population of the Bradford District
- 11.4 The HIA has two parts. The first part looked at each Strategic Objective, Strategic Core Policy, and more generally at the Thematic Policies. These were assessed for the health and wellbeing impact that they were likely to cause, using the Public Health Outcomes Framework.
- 11.5 The second part was a gap analysis and gave a series of recommendations that would ensure the Core Strategy contributes towards creating an environment that

positively impacts on physical and mental health. It examined whether factors that could have a positive impact on health and wellbeing are covered within the CSFED.

- 11.6 The HIA concluded with 10 proposed inclusions to be used in the CSPD.
- 11.7 The HIA was used to inform the CSPD. A Planning Response Document was produced to show how the CSPD took account of the 10 proposed inclusions.
- 11.8 The Response Document was accepted by letter from the Department of Public Health in Feb 2014.
- 11.9 Together, the HIA; the Planning Response Document; and the acceptance letter from the Department of Public Health, comprise an HIA of the CSPD.

## **12.0 Self Assessment of Soundness**

- 12.1 The Council has produced a self assessment of the soundness of the core strategy using the latest version issued by the Planning Advisory Service. This sets out at a high level how the Core Strategy meets the key tests of soundness and sets out evidence to support this.

## **13.0 Self Assessment of Legal Compliance**

- 13.1 The Council has produced a self assessment of the legal compliance of the core strategy using the latest version issued by the Planning Advisory Service. This sets out at a high level how the core strategy meets the key legal tests of soundness and sets out evidence to support this.

## APPENDIX 1 Evidence Base

Evidence	Author	Date	Policies	Key elements
Studies /Technical Assessments				
Settlement Study	CBMDC	2011	<b>SC4</b> Hierarchy of Settlements	The settlement study has provided an extensive baseline resource to inform and confirm the appropriateness of the settlement hierarchy and the placement of each town or village within it.
Growth Assessment	Broadway Malayan	2013	<b>SC5</b> Location of Development	The approach of the Core Strategy is to combine sites from a number off different types of location but prioritising those within the existing urban areas. The Growth Assessment provides a resource to establish that there are sustainable options for growth of different scales in edge of centre locations should these be needed once the capacity and contribution from locations within settlements has been exhausted.
			<b>SC7</b> Green Belt	The growth assessment provides a comprehensive assessment of the potential for development in green belt locations. Most significantly it confirms that there a range of options for small and medium scale changes which would not undermine the strategic role of the green belt but which cumulatively could make a significant contribution to

			<b>SC5</b> Location of Development	the required land supply.
			<b>HO2</b> Strategic Sources of Supply	Local green belt changes are a key element of the potential land supply to meet housing targets in most of the district's settlements. The growth study provides a strategic analysis of the potential options for change around each settlement and confirms that these options provide a significant supply of land should it be needed. Although not all of the identified strategic parcels may prove suitable for allocation when subject to more detailed testing, the study nonetheless demonstrates the existence of a range of sustainable locations for growth and thus demonstrates that the Core Strategy's approach of combining deliverable and developable sites within the settlements together with a significant contribution from edge of settlement sites is appropriate and achievable. More specifically the study has indicated that strategic parcels around the Bradford South east quadrant, including the proposed Holme Wood Urban Extension provide a sustainable option for accommodating some of the development needs of the Regional City.
			<b>HO3</b> Distribution of Housing	The housing targets have drawn upon a

			Requirement	number of elements of the study – most notably the extent of land within identified strategic parcels around each settlement (unconstrained or low constraints) and the reports conclusions on which settlements and areas would provide the most sustainable options should further green belt releases be needed.
Habitat Regulation Assessment	Urban Edge	2013	<b>SC8</b> Protecting the South Pennine Moors and their zone of influence	
			<b>HO3</b> Distribution of Housing Requirement	The HRA has influenced the distribution in 2 main ways. Firstly the HRA of the CSFED indicated a need to reduce the level of development within settlements affected by the 2.5km zone. This reinforced a decision to, land supply permitting, modestly increase the focus on the regional city as the area where household growth is likely to be greatest and services and employment opportunities are focused. Secondly the subsequent HRA survey work enabled the mapping of locations where key bird species were observed and also where key supporting habitats exist. This allowed these most sensitive locations to be compared with the distribution of potential SHLAA sites on the edge of the settlements within the 2.5km zone. This also then allowed each reduced and revised settlement target to be

				assessed to see if sufficient sites and capacity existed to avoid the need to utilise sites where species or habitats had been mapped in the event that future more detailed work ruled these effected sites as unsuitable for development.
Bradford District Retail & Leisure Study and Update	WYG	2008 / 2013	<b>EC5</b> City, Town, District and Local Centres	NPPF Compliant Retail & Leisure Study. Objectively assessed retail needs and capacity assessment. Town Centre Health Checks. Recommendations on locally set retail impact assessment thresholds. Recommendations on the network and hierarchy of retail centres. Bradford District Retail & Leisure Study (2008) informed the Core Strategy FED. The Bradford District Retail Study Update (2013) was prepared in accordance with the NPPF and informed policy EC5 in Core Strategy PD.
Bradford District Housing Requirement Study – Main Report and Addendum and update Report	GVA/Edge Analytics	February & August 2013 November 2014	<b>HO1</b> Scale of Housing Required	The study has fed directly into the formulation of the objectively assessed housing requirement as set out in Policy HO1. It has utilised a range of data, most notably the most up to date population and household projections issued by the ONS and CLG but has also factored in local projections of economic and jobs growth from the Regional Econometric Model. It has



				considered the effects of different variables such as migration and constructed a number of scenarios. Both the initial and addendum report have set out a range from within which the housing requirement should be set and in each case indicated broadly where in the range the target should be set.
Strategic Housing Land Availability Assessment (SHLAA)	CBMDC/Stakeholder Steering Group	2011 & 2013	<b>HO2</b> Strategic Sources of Supply	The results of the SHLAA together with that from the housing land register has provided a key overview of the nature of the potential land supply, most notably the split between planning commitments and new sites, between sites which have no strategic policy constraints and those which have such constraints and would therefore need a proactive change in status via allocation in the local plan, and the scale and nature of contribution which is needed from changes to the green belt.
			<b>HO3</b> Distribution of Housing Requirement	The SHLAA provides site by site analysis of sites deliverable in the short term (over the next 5 years or so) and the developable sites within the medium and longer term. It provides details both of the geographical spread of deliverable and developable sites and the nature of those sites and the extent to which the land supply is dependent on contributions from currently

				protected areas such as green belt. It has therefore been fundamental to the setting of settlement targets and indicating the effects and implications if different distribution options and therefore settlement targets were chosen. The results of the SHLAA are deliberately presented in map and tabular form at settlement level so that both the chosen Core Strategy targets can be shown to be achieved but also what the broad effects on each settlement might be.
			<b>HO6</b> Maximising use of Previously Developed Land	The SHLAA indicates at all geographical scales the split between capacity and contribution from deliverable and developable previously developed (brown field) land and that of green field land. The SHLAA data has therefore been used to gauge challenging but realistic targets for the proportion of development which can be secured on PDL both at district wide level and at each level of the settlement hierarchy.
			Sub area policies	The sub area policies have been written in such a way as to indicate in broad terms how and in what sort of locations the required development and growth will be accommodated – for example whether by existing recycled land within then urban area, via large or small

				sites, or via small scale of more significant changes to the green belt. These policy indications have been informed by the settlement by settlement analysis of the potential land supply within the SHLAA.
Strategic Housing Market Assessment (SHMA)	ARC4	2010 & 2013	<b>HO8</b> Housing Mix	The SHMA provides an analysis of the key housing market drivers in Bradford and these in turn lead to a number of specific groups for which need and demand must be accommodated within the Local Plan. Policy HO8 Housing Mix will plan for a mix of housing based on demographic and market trends and the needs of different groups in the district. Policy HO8 has been informed by the most up to date evidence in the Bradford SHMA 2010 and Update 2013.
			<b>HO11</b> Affordable Housing	The Local Plan must meet the full objectively assessed need for affordable housing in the housing market area. Evidence in the SHMA justifies the need for affordable housing. The latest assessment identifies shortfalls in affordable housing across the district and estimates an overall net annual requirement for approximately 587 new affordable homes. Policy HO11 will aim to ensure that a sufficient supply of good quality affordable housing is delivered to meet the affordable housing needs of the district.

				To meet the identified need for affordable housing in the district the council will aim to ensure that 20 to 25% of the total housing delivery is affordable housing.
Affordable Housing Economic Viability Assessment (AHEVA)	Level	2010	<b>HO11</b> Affordable Housing	The AHEVA produced recommendations on the viability of the proportion of affordable housing, site thresholds and tenure splits in different locations and on a range of different site types across the district. These findings have been used to inform the site size thresholds and tenure splits in Policy HO11.
West Yorkshire Gypsy & Traveller Accommodation Assessment	Centre for Regional Economic and Social Research (CRESR)	2008	<b>HO12</b> Provision of Sites for Gypsies, Travellers and Travelling Show people	Policy HO12 has set targets for new pitch and plot provision which reflect the objectively assessed need within the West Yorkshire Study. The study assessed both current unmet need and need arising from future household growth and was based on a range of quantitative and qualitative data. Most notably it included significant survey work and input from the traveller and travelling show people's communities. The Bradford related results of the West Yorkshire Study are currently being verified, tested and updated by the commissioning of a update study from Consultants Arc4.

Bradford District Employment Land Review	ARUP / CBMDC	2008 / 2011	<b>EC1</b> Creating a successful and competitive Bradford District economy within the Leeds City Region	<p>Overview of the economic structure of the District.</p> <p>Assessment of:</p> <ul style="list-style-type: none"> <li>• the employment land supply;</li> <li>• projected demand for employment land over the plan period;</li> <li>• market and property trends and data; and</li> <li>• a comparison of the supply of employment land against the likely market demand and property trends, assessing location and size in terms of the potential B Class Uses.</li> </ul>
			<b>EC2</b> Supporting Business and Creating Jobs	
			<b>EC3</b> Employment Land Requirement	
Understanding Bradford District Report	CBMDC	2013	<b>EC1</b> Creating a successful and competitive Bradford District economy within the Leeds City Region	<p>Provides a comprehensive analysis of Bradford District bringing together a range of evidence and intelligence from a variety of sources. It builds on the former 'Bradford District Local Economic Assessment' and highlights the key drivers that shape the current position of the District and its future opportunities and challenges.</p> <p>It provides a broad understanding of the local economy and the economic, social and environmental factors that impact on economic growth in Bradford District.</p>
			<b>EC2</b> Supporting Business and Creating Jobs	
			<b>EC3</b> Employment Land Requirement	
			<b>EC4</b> Sustainable Economic Growth	
Bradford District Wide Transport Study	SDG	2010	<b>HO3</b> Distribution of Housing Requirement	The Transport Study was used in the earlier stages of the Core Strategy work to test outcomes against a range of

				<p>transport related criteria of different spatial options for distribution growth between the different tiers of the settlement hierarchy. It also assessed the effects of different levels of concentration of development on the urban area as opposed to dispersal of development to growth points or to the smaller settlements. The work enabled the Council to reach a number of early quite important conclusions most notably that none of the 4 spatial options performed sufficiently better against the transport related criteria to warrant the derivation of a purely transport oriented distribution strategy. It also highlighted the corridors and locations which were particularly sensitive to the effects of development and growth and this has in combination with other factors such as land supply or environmental assets resulted in modest changes to the distribution, for example the reduction in proposed development targets from CSFED to CSPD in the A65 corridor.</p>
<p>Viability Assessment of Local Core Strategy FED and Publication Draft</p>	<p>DTZ</p>	<p>2013 and 2014</p>	<p><b>ID2</b> Viability</p>	<p>NPPF and National Planning Guidance compliant Viability Assessment of the Core Strategy FED (2013) has informed the policies in the Core Strategy PD. Following the public consultation on the CS PD, a Viability Assessment of the</p>

				Core Strategy PD (2014) has been prepared in order to demonstrate how policies have evolved to create a deliverable plan in accordance with the requirements in NPPF and the National Planning Practice Guidance.
			<b>ID3</b> Developer Contributions	Viability Assessment of CS FED ensures that the developer should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.
Local Infrastructure Plan	DTZ/ARUP/CBMDC	2013	Sub area Policies	Baseline analysis of key issues affecting the district. Infrastructure Assessment by sub area. Cross-boundary Issues. Infrastructure Requirements. Infrastructure Delivery Schedule. Infrastructure Funding Gap and Options.
			<b>ID3</b> Developer Contributions	Infrastructure Delivery Schedule. Infrastructure Funding Gap.
Strategic Flood Risk Assessment Level 1	JBA/CBMDC	2014	<b>SC1</b> Overall Approach and Key Spatial Priorities	The sequential approach to development advocated within the NPPF, the information and results of the SFRA, and the nature and distribution of the land supply have combined to inform the housing targets for each settlement. The information within SFRA and the SHLAA shows that in the vast majority of cases the proposed settlement targets can be met entirely from land within flood zone 1 with the
			<b>HO3</b> Distribution of Housing Requirement	
			<b>EN7</b> Development and Flood Risk	

				lowest overall probability of flood occurrence. The results do also show those areas where there is some sensitivity to flood risk and where further work will be needed to test options and develop mitigation and infrastructure investment programmes.
Bradford Open Space and Recreation Study	KKP	2006	<b>SC6</b> Green Infrastructure	Assessment of current provision and deficiencies for range of open space typologies.
			<b>EN1</b> Open Space, Sports and Recreational	Projected need for open space to meet future needs and possible local standards.
Minerals Evidence Base Report	CBMDC	2014	<b>EN9</b> New and Extended Minerals Extraction Sites	This report collates and appraises all available evidence pertaining to the location, type, quality and quantity of minerals resources within the District.  The report also explores supply and demand issues relevant to the District and in particular the importance of the Local Building Stone Industry. The report is informed by evidence from various local, national and regional reports and surveys.
			<b>EN10</b> Sandstone Supply	
			<b>EN11</b> Sand, Gravel, Fireclay and Hydrocarbons	
			<b>EN12</b> Minerals Safeguarding	