

MATTER 5: ECONOMY AND JOBS

POLICY EC1 – CREATING A SUCCESSFUL AND COMPETITIVE ECONOMY

POLICY EC2 – SUPPORTING BUSINESS AND JOB CREATION

POLICY EC3 – EMPLOYMENT LAND REQUIREMENT

POLICY EC4 – SUSTAINABLE ECONOMIC GROWTH

POLICY EC5 – CITY, TOWN, DISTRICT AND LOCAL CENTRES

Key issue:

Does the Plan set out a clear, effective and soundly based economic strategy which positively and proactively encourages sustainable enterprise and economic growth, and are the policies for economic prosperity, rural economy, employment land, city, town, district and local centres appropriate for Bradford, supported by a robust, credible and up-to-date evidence base and consistent with the latest national policy?

5.1 Policy EC1 – Creating a Successful and Competitive Economy:

- a. Is there sufficient evidence to justify the criteria and requirements for investment and planning decisions to deliver the particular economic benefits, as set out in the policy?
- b. Is the economic strategy appropriate, justified, effective, positively prepared, soundly based and consistent with the Leeds City Region LEP's economic growth strategy?
- c. Is the approach in line with national policy (NPPF/PPG)?
- d. Does the policy give sufficient preference to supporting the rural economy, including agricultural and rural businesses, and to the tourism economy?

5.2 Policy EC2 – Supporting Business and Job Creation:

- a. What is the basis for the proposed delivery of at least 2,897 jobs per year; is it justified by evidence and is it effective, deliverable and consistent with the latest national guidance (NPPF/PPG)?
- b. What is the relationship between the delivery of 2,897 jobs per year and the housing target supporting some 1,600 jobs/year?
- c. How will this number of jobs actually be created and delivered?

5.3 Policy EC3 – Employment Land Requirement:

- a. What is the basis and justification for the employment land requirement for 135ha of employment land, is this effective and deliverable, and is it consistent with the latest national guidance (NPPF/PPG)?
- b. What is the basis and justification for the proposed distribution of employment land to the specific areas listed and the sources of supply identified, including the areas of search for high quality employment locations?
- c. Has the policy considered the detailed impact of employment land provision on particular communities, including Wharfedale?
- d. Has the policy properly considered the impact on roads and traffic congestion (including M602 and junctions), accessibility, the need to use brownfield land, infrastructure requirements, the environment, and the need to balance housing with employment land provision?

5.4 Policy EC4 – Sustainable Economic Growth:

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- a. Is the approach to assessing proposals in terms of sustainable economic development, including the criteria and requirements set out, consideration of proposals for alternative development on employment land, identifying Strategic Employment Zones and requiring BREEAM standards to be met, effective, deliverable and consistent with the latest national guidance (NPPF/PPG)?
- b. Is the approach to protecting existing employment sites, including the key employment areas and sites identified and the criteria for permitting alternative uses, appropriate, justified, effective, soundly based and consistent with national guidance (NPPF/PPG)?
- c. Does the policy consider accessibility, viability, regeneration and infrastructure requirements?
- d. Does the policy give sufficient support for agricultural and rural businesses?

5.5 Policy EC5 – City, Town, District and Local Centres:

- a. Does Policy EC5 provide an appropriate, effective and soundly based framework for establishing the hierarchy of retail centres in Bradford and for maintaining and enhancing the roles, functions, viability and vitality of the City, Town, District and Local Centres, including the locational and other criteria, which is justified with evidence and consistent with national policy?
- b. Is there sufficient evidence to justify the proposed hierarchy of centres?
- c. Should the policy or accompanying text indicate the capacity for additional town centre and retail development in the main towns and service centres, having regard to the Retail & Leisure Studies and NPPF (¶ 23); and should the boundaries of town centres and primary shopping areas be defined in this Plan?
- d. Are the thresholds for impact assessments and sequential assessments justified by evidence, and is the approach of the policy effective, positively prepared, soundly based and consistent with national guidance (NPPF/PPG)?

5.1 – POLICY EC1:-

We have responded to a number of these questions in our March 2014 submissions, and in our matter 2, 3, 4A, 6A, 6B and 6C submissions.

5.2 – POLICY EC3:-

Our matter 4A response on the housing need and requirement refers to the 2,897 job/annum target as being over optimistic and we advocate a job creation total slightly above the Experian (Dec 2014) projection prepared on behalf of NLP. We advocate that the annual housing requirement and job creation totals should be more closely aligned.

5.3 – POLICY EC3:-

We consider that the 135 ha of employment land is deliverable provided the positive policy initiatives we have advocated are put in place. The growth plans for LCR and the regional economy and the key role of Bradford as a growth centre support at least this level of provision.

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We do consider the impact of employment land provision in Wharfedale in our matter 6C response.

5.5 – POLICY EC 5:-

We conclude that the proposed hierarchy of centres is appropriate with the exception of the need to reinstate Menston and Burley as Local Growth Centres.

It would be helpful at this strategic planning stage to provide for the identification of town centre and/or primary shopping area expansion. The future boundaries should be defined in the Core Strategy.