



## **Bradford Local Plan**

### **Core Strategy Examination**

#### **Matter 1: Legal**

**Further Statement on Leeds City Region  
Consideration of the Bradford Core Strategy in  
particular with regards to the Habitats  
Regulation Assessment.**

**Date: 4<sup>th</sup> March 2015**

**Venue: Victoria Hall, Saltaire**

- 1.1 This statement sets out information on the relevant minutes from the Leeds City Region duty to cooperate arrangements with regards to the Core Strategy, in particular the work on the Habitats Regulation Assessment (HRA). The request was made at the hearing on day one linked to the discussion on the soundness of the HRA evidence and any discussions on methodology and citation.
- 1.2 As part of the discharge of the duty to cooperate the Bradford Core Strategy was presented to the meeting of the Leeds City Region Planning Portfolio Holders on two occasions prior to submission. The first in February 2014 prior to consultation on Publication Draft and the second in October 2014 prior to submission.
- 1.3 The Meeting held on 7 February 2014 considered the publication draft and evidence. The minute from the meeting in relation to the item on the Bradford Core Strategy is included in Appendix 1. This sets out the high level discussion including reference to the HRA work and engagement with Natural England. The discussion did not formally consider the HRA in detail including any discussion of the Citation.
- 1.4 The second meeting held on 13 October 2014 provided an update on further work in support of the Core Strategy and work to discharge the duty up to the point of submission and sought final sign off for the final Core Strategy LCR Duty to Cooperate Strategic Issues Table (see Appendix 4 to SD 006). The minute from the meeting in relation to the item on the Bradford Core Strategy is included in Appendix 1.
- 1.5 The Leeds City Region Portfolio Holders is supported by an officer level meeting. This considered the core strategy on several occasions but including the general considerations of the HRA but never discussed in detailed the HRA methodology or the issue of the citation.
- 1.6 In conclusion the Council undertook appropriate, ongoing and proportionate engagement in support of the Duty to Cooperate through the LCR arrangements (as set out in the Statement of Cooperation), which included sharing the conclusions of the HRA work but did not deal with detailed methodological issues.

## Appendix 1

Extracts from minutes of meeting of Leeds City Region Planning Portfolio Holders in relation to Bradford Core Strategy

## **Leeds City Region Portfolio Holders Meeting**

**7 February 2014**

### **ATTENDEES**

Cllr Gruen (Chair) Leeds  
Cllr Slater Bradford  
Cllr McBride Kirklees  
Cllr Mackman Selby  
Cllr Collins Calderdale  
Cllr Foster Craven  
Cllr Merrett York  
Cllr Miller Barnsley

### **IN ATTENDANCE**

Julian Jackson Bradford  
Andrew Marshall Bradford  
Patrick Auterson Kirklees  
Phil Crabtree Leeds  
Geoff Willerton Calderdale  
Ian Thomson Wakefield  
Martin Grainger York  
Carl Bunnage North Yorkshire  
Stephen Brown Craven  
Linda Marfitt Harrogate  
Stephen Morallee Barnsley  
Bob Pritchard Leeds  
Colin Blackburn LCR  
Andy Haigh Andy Haigh Associates  
Andrew Fowler Edge Analytics  
Peter Boden Edge Analytics

### **3. BRADFORD CORE STRATEGY CONSULTATION**

Julian Jackson and Andrew Marshall presented an update on Bradford Metropolitan District Council's Core Strategy. The submission draft went to Full Council December 2013 and will be submitted to Secretary of State later in 2014. The key themes, of particular relevance to this Group, are housing and economic development. 4 strategic issues were outlined:

- Housing development (scale and distribution)
- Employment development (scale and distribution)
- Green Belt change and long term boundaries
- Infrastructure (Inc. transport and education)

Bradford's housing requirement was reassessed in 2013 and consultation responses have been taken into account. Work looking at Objective Housing Need has been undertaken to inform the Plan by consultants GVA and Edge Analytics. The new housing requirement over the plan period is 42,000 which is a modest reduction on RSS targets (the new figure includes backlog and 3000 has been deducted to be met by bringing empty properties back into use). The SHLAA has been updated and identifies land equivalent to the provision of 54,000 units; this doesn't allow much slack with regard to the target therefore a green belt review will be required going

forward.

Andrew also commented that there have been particular difficulties in relation to the South Pennine Moors protected areas and the plans potential impact on the internationally important bird habitats. Some work has had to be done to readjust Bradford's scale and distribution of housing development and growth areas. A table detailing growth areas and target number of units was presented. It was noted that the redistribution had resulted in reductions in the strong housing markets of the District.

Discussion followed and the following issues were raised:

- Several authorities are in a similar position on green belt release. Bradford commented that a 'Growth Study' has been undertaken, a high level study looking at green belt function, the sustainability of each settlement and land availability. Further detailed work would be required to determine where green belt release could occur. DTZ have also undertaken some work on Plan viability for Bradford.
- Authorities have taken different approaches to windfall sites and safe-guarded land and it can be an area of risk at examination.
- The base date used for housing projections (Bradford use RSS date of 2004) was discussed.
- A pre-submission meeting with an inspector as recommended by PINS, was held in October to discuss big issues.
- Bradford Council confirmed that feedback from Natural England so far would suggest that they are broadly happy with the approach taken but would be working closely up to submission with NE.
- Bradford is proposing a selective greenbelt review; in order to meet its housing needs within the plan period and noted advice from others that a full review may be required to be sound.
- Bradford has a jobs target of 2897 jobs per annum; existing employment land supply is tired and not in the right places. There is a need for additional supply of quality employment sites; 3 have therefore been identified currently in the greenbelt.
- Bradford is struggling on the viability issue having done some viability work in the context of CIL. Without CIL infrastructure would be funded through the Single Growth Fund and other existing / future funding opportunities.
- Next steps for Bradford are consultation prior to submission to Secretary of State for examination in July 2014. Allocations work will begin immediately following submission.
- Cllr Gruen concluded the discussion commenting that the LCR need to work in partnership; worst situation is one where we have no adopted plan and referred to the memorandum of understanding that Leeds City Council has in place with neighbouring authorities where ward politicians are able to comment individually but this would not necessarily mean that the City Council would object.

## **RESOLVED**

1. That Julian Jackson and Andrew Marshall be thanked for their presentation and input to the meeting.
2. That Julian Jackson share the work undertaken on viability / green belt assessment in developing the Bradford Core Strategy.

## Leeds City Region Portfolio Holders Meeting

13 October 2014

### Board Members

Cllr Gruen (Chair)	Leeds
Cllr Slater	Bradford
Cllr Mackman	Selby
Cllr Merrett	York
Cllr McBride	Kirklees
Cllr Mitchell	Barnsley
Cllr Jeffrey	Wakefield
Cllr Caffrey	Calderdale
Cllr Foster	Craven
Cllr Harrison	Harrogate
Merran McRae	Calderdale (CX Lead)

### Apologies

Cllr Miller	Barnsley
Cllr Dadd	North Yorkshire
Cllr Metcalfe	North Yorkshire

### In Attendance

Julian Jackson	Bradford
Andrew Marshall	Bradford
Peter Taylor	Barnsley
Phil Crabtree	Leeds
Richard Hollinson	Kirklees
Keith Dawson	Selby
Neil Rodgers	Wakefield
Stephen Brown	Craven
Phil Ratcliffe	Calderdale
Ian Stokes	York
Colin Blackburn	LCR Enterprise Partnership
Alison Gillespie	LCR Enterprise Partnership

## ITEM 4 BRADFORD CORE STRATEGY DTC TEMPLATE

Julian Jackson introduced Item 4 on the strategic, cross boundary issues relating to Bradford's Core Strategy. In line with the commitments set out in the recently agreed LCR Statement of Cooperation on Local Planning, the cross-boundary issues were presented to the board in February 2014 prior to a 6 week public consultation period on the Publication Draft. A summary of the Strategic Duty to Cooperate issues and outcomes using the agreed LCR template has been circulated and Bradford is seeking endorsement from the Board on the approach to the Duty. The intention is that the Core Strategy will be submitted by end of November for examination in spring 2015.

Andrew Marshall highlighted the key issues in the Duty to Cooperate Table:

- Scale and location of homes – based on the district SHLAA, significant green belt release is required (up to 11,000 homes).
- Infrastructure – cross boundary issues identified particularly on the transport side, strategic issues being worked through WYCA and looking at the emerging infrastructure requirements to deliver the scale of housing growth required.
- Housing market areas - Bradford is planning to meet in full its objectively assessed housing need. While there are housing interrelationships with other districts these are minor and the plan is based on the District being a self-contained housing market.
- Travellers and show people – Plan requirement is based on previous West Yorkshire study. Work is ongoing to provide a more up to date assessment for the District and new evidence on requirement will be tabled at examination.
- Employment – the strategy is to provide new supply based on past delivery as well as intensification in key areas such as Bradford City Centre.
- Habitats Regulation Assessment - There have been objections from developers to the HRA and how it has changed to distribution of development. Further work has been undertaken to update the HRA including commitment to produce a new Supplementary Planning Document to assist in mitigating the impact of development in particular visitor pressure through alternative green space provision.
- Green belt – Seeking to meet development need in full which will require a green belt review using exceptional circumstances. Given land supply and other constraints and scale of change within the plan period together with uncertainties in long term needs the plan is not looking to release further land as safeguarded land. Longer term extent of the green belt to be considered strategically in future plans.

The following issues were raised in discussion:

- 5 year land supply – Bradford currently has a 2.3 year land supply.
- Transport networks – noted ongoing M65 corridor Study and the A56 are significant.
- Windfall sites – Bradford have not included windfall assumptions in the supply, the site threshold has been reduced to bring in more sites but the approach is to plan positively for the full requirement with allocations. It was noted that Windfall would occur and will support a green belt that can last beyond the plan period by allowing the allocations to last longer. In this way Windfall could help with the safeguarded land position, (Leeds City Council for example included a 500 unit annual windfall allowance).
- There may be value in separating the NPPF requirements and the legal requirements of the Duty to Cooperate under the Localism Act.
- Timing of the submission with regard to elections. It is considered that there is no optimum time of year.

## **RESOLVED**

1. That the issues and outcomes identified in the Duty to Cooperate matrix be noted and that Bradford City Councils approach to the Duty to Cooperate be endorsed.