

## **Bradford Local Plan**

### **Core Strategy Examination**

#### **Matter 3: Policy SC7 Green Belt**

#### **Further Statement on Exceptional Circumstances for Green Belt Change (Update)**

**Date: 6<sup>th</sup> March 2015**

**Venue: Victoria Hall, Saltaire**

## **Introduction**

- 1.1 The district has a longstanding designated Green belt, which was first comprehensively established in the Unitary Development Plan adopted in 1998. The green belt boundary was reviewed and revised in the Replacement Unitary Development Plan (RUDP) adopted in 2005, in order to meet need for housing and also to identify safeguarded land. The RUDP had a 10 year plan period to 2014 and planned for a housing requirement of 1390 dwellings per annum which was made up of 440 dwellings from Conversions/windfalls and 950 in allocations. The Inspector recommended the removal of a small number of housing sites from the green belt in order to meet overall need i.e. at Menston and at Simpson's Green, Apperley Bridge. It also allocated safeguarded land for a further 5 years beyond the plan period.
- 1.2 Paragraph 82 of the National Planning Policy Framework (NPPF) allows for the review of Green Belt boundaries under exceptional circumstances through the preparation of the Local Plan. This further statement sets out the detailed justification for the exceptional circumstances which justify the change of green belt boundaries to accommodate development to meet both housing and economic development needs. The justification for each type of need is set out in turn below. This should be read in conjunction with the previous Council statements submitted to the examination.

## **Exceptional Circumstances – Housing Need**

- 2.1 Paragraph 47 of NPPF makes clear that Local Plans should meet their objectively assessed housing need in full as far as is consistent with the policies set out in the framework. The Council have reviewed both the policies within the NPPF and the relevant evidence base, concentrating in particular on whether there is:
  - a. Potential to release land from the green belt in sustainable locations;
  - b. Potential to release green belt land without significantly undermining the functioning of the green belt at a local and strategic level; and
  - c. The extent to which the locations which pass the two tests above are otherwise constrained by other environmental designations and criteria
- 2.2 The Council have also taken account of the strong role which housing plays in supporting life outcomes, the need to regenerate its urban areas, and the direct and indirect benefits which investment in new housing can bring to the district's economy. It has also been mindful of the danger that if economic and jobs growth outstrips the provision of new housing, the benefits that may or may not accrue from slightly smaller green belt change would be outweighed by increased levels of commuting which in turn would impact on the Council's goals to reduce greenhouse gas emissions, reduce or manage congestion and improve air quality.
- 2.3 Policy HO2 together with the Council's Housing Background Paper 2 (SD016) clearly set out the evidence which indicates that there are exceptional circumstances which justify releasing green belt to meet the objectively assessed

needs for new homes in the district. Based on the evidence supplied by the SHLAA update (EB049) it is clear that the scale of housing required within the District under policy HO1 will only be capable of being met if a significant contribution is made by changes to the green belt. Together, the objectively assessed need for new housing and the inability to meet all of that need in non green belt locations forms a significant part of the Council’s argument that the exceptional circumstances required by paragraph 83 of the NPPF are present. The Growth Assessment has shown that there are a significant number of strategic land parcels which adjoin settlements which could be developed in a sustainable manner and which would not unduly harm the strategic functioning of the green belt in line with paragraph 84 of NPPF.

2.4 Policy HO1 establishes a Housing requirement for the plan period of 42,100 dwellings to 2030. The data and calculations from the updated SHLAA (EB049) which have informed the estimated green belt quantum is set out in Appendix 3 to the Housing Background Paper 1 (SD016), which is replicated at the end of this paper. The headline figures from the SHLAA land supply are included below for information. Based on the SHLAA update it is estimated that around 11,000 homes may be required to be located on land currently designated as green belt.

<b>SHLAA SUMMARY (Deliverable or Developable Sites)</b>	
<b>Phasing Break Down</b>	
Short term deliverable	8,554
Medium term developable	27,432
Long Term Developable	13,872
Residual Developable	3,850
<b>Constraints Breakdown</b>	
Suitable Now	19,493
Policy Constraints*	33,237
of which safeguarded land element	4,607
of which green belt element	19,000
Physical Constraints	978
<b>PDL / Green Field</b>	
PDL	18,067
Green	35,641
<b>TOTAL SHLAA POTENTIAL</b>	<b>53,708</b>

*\*This figure includes all sites affected by some form of current Planning policy constraint ranging from group TPO's to green belt.*

2.5 It is important to stress that this numerical estimate does not form a policy within the plan. Other parts of the plan, including Policy HO7 (Site Allocations Principles) stress that the Council will seek to minimise as far as possible green

belt release when it prepares the detailed site allocating components of the Local Plan. The estimate is therefore provided merely to ensure that there is complete clarity over the potential implications of the Core Strategies policies. The final number of homes required in the green belt could change if more sites are found within settlements, and if the yield from sites turns out to be higher or lower than those assumed within the SHLAA. The need for a substantial green belt contribution of broadly the scale indicated in the Core Strategy looks likely to be further verified by the latest update of the SHLAA which is nearing completion.

- 2.6 Having established that the land supply in non green belt locations is not available to meet the districts needs the Council then commissioned a District wide Growth Assessment. This has confirmed both that there are sustainable locations within the green belt for growth and that there are areas where the green belt can be changed without leading to the undermining of the role of the green belt either locally or strategically. It should be noted that the green belt boundaries across the district have been drawn very tightly into the existing edges of those settlements leaving more scope for future releases than would otherwise have been the case.

### **Exceptional Circumstances – Employment Need**

- 3.1 Paragraph 20 of NPPF looks to planning to proactively meet the development needs of business and support an economy fit for the 21st century. Paragraph 21 sets out the roles of Local Plans. This includes:
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
  - support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area; and
  - plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.
- 3.2 The Core Strategy is supported by an up to date Employment Land Review (EB027) which reviews the employment land supply and has considered market issues. See also Background Paper 3; Employment and Jobs (SD018). The evidence has been used to review and inform the proposed land supply and distribution. In particular the Core Strategy is seeking to support a mix of sites both in size and quality in good market locations.
- 3.3 The Core strategy proposes a need for green belt deletions to provide land for quality employment opportunities in three strategic locations across the District as set out in Policy SC1, in Policy BD1, in Policy AD1 and in Policy EC3. In broad terms these locations comprise (i) North East Bradford in the Apperley Bridge Area, (ii) South East Bradford and (iii) Keighley area in Airedale. Within the spatial

and economic dimensions of the Core Strategy, these sites are considered as strategic locations for new employment land.

- 3.4 This further statement explains the exceptional circumstances which justify the change of green belt boundaries to accommodate employment land generally and specifically to support development in the strategic locations.
- 3.5 The three strategic locations identified for future employment growth in Policy EC3 of the Core Strategy currently lie within the green belt as defined in the District's Replacement Unitary Development Plan. Development proposals will therefore require specific changes to the green belt boundary. The DCLG Policy Statement 'Housing and Growth' dated 6 September 2012 states that Councils can review local Green Belt designations to promote growth and there is encouragement to use the flexibilities set out in the NPPF to tailor the extent of Green Belt land in their areas to reflect local circumstances. It goes on to say that 'There is considerable previously developed land in many green belt areas which could be put to more productive use'.
- 3.6 The exceptional circumstances which have led the Council to propose the development of land in the green belt at the three broad locations arise from the need to provide additional jobs in the District through economic growth and to secure inward business investment in line with NPPF and based on local evidence. The results of the 'Employment Land Review' (EB027) suggest that some green belt deletions may be required to deliver the necessary employment growth over the plan period. Whilst it is not only the quantity of employment land supply that is important to maintain economic development, it is the quality of the supply, in the right locations, to attract inward investment and provide local jobs for areas with high levels of deprivation. It is also the need to improve the profile of the supply to meet the needs of growth sectors within the economy particularly logistics in South Bradford and digital clusters in Airedale. Modern industrial demand is greatest for locations that have flexibility for single storey development on large floor plates. Other influences include good connections to principle transport infrastructure, access to markets in neighbouring towns and cities, proximity to labour and land values. The exceptional circumstances for the release of land in the green belt are therefore twofold:
  - (1) A lack of well located employment sites of the right profile in terms of size and location to support the economy and employment strategy of the plan
  - (2) The need for strategic employment sites which cannot be met within the urban area
- 3.7 Section 5.1 of the Core Strategy, 'Economy and Jobs' together with the 'Employment Land Review' as contributory evidence, explores the need for new employment opportunities and inward investment required across the District. It determines the current levels of employment land supply and assesses the extent to which current supply can meet future needs. Based on recent projections from the Regional Econometric Model, there is a considerable shortfall of quality employment sites within the Bradford Urban area and in Airedale to meet projected demand. Based on annual take up of employment land, which averages at around

9 hectares per annum, the Core Strategy proposes a requirement for 135 hectares of employment land to meet projected economic growth over the Plan period. The survey of employment land availability in April 2014 identified only 116.03 hectares of undeveloped employment land across the District. However, the majority of these sites which make up this supply are less than 1 hectare in size. Many are in locations which would help provide local services only, and are generally not the larger flexible sites needed in highly accessible locations to meet the demands of modern enterprise, attracting potential investors and markets. This situation has resulted in part from the changing nature of businesses and the changing nature of modern locational requirements and the fact that the land supply has not been significantly re-modelled to reflect this since the RUDP was formulated in the early 2000's. In addition, In some cases they are more suitable for other uses such as housing. The moor and valley dominated topography of the District further limits the availability of relatively level, accessible sites the District needs to ensure long term economic stability and growth. These conclusions are supported by the work within the 2 Employment Land Reviews (ELR) produced by the Council which not only estimated future need for employment land but assessed the quality, suitability and deliverability of the existing employment land supply, rating them against a range of criteria. The ELR thus identified a number of sites which performed weakly against these criteria and which could therefore be more suitably allocated for other uses.

- 3.8 Policy SC1 proposes a housing requirement of 42,100 new homes across the District in line with distribution set out in policy HO3. The SHLAA update has estimated provision for only 19,493 new dwellings on potential sites which have no constraints and are suitable for development at present. These include a number of sites which are allocated for employment purposes in the RUDP. Consequently there will be pressure to deliver new housing on many of the less well located or less market ready employment sites together with those that have some physical constraints and this will further reduce the supply of available employment sites. Already, a number of allocated employment sites in the RUDP have been lost to housing development, have outstanding planning permission or have support in principle for residential use. These sites are listed below:

Employment Sites Lost to Residential Development:

BN/ E1.14 (3.26 ha), Harrogate Road, Greengates

BS/ E1.15 (2.83 ha) Kaycel Street/Burnham Avenue, Bierley

BS/E1.31 (4.65 ha – Approx 2.5 ha developed for housing) Royds Hall Lane, Woodside

BW/E1.8 ( 1.68 ha) Bell Dean Road, Allerton

BW/E1.12 (0.5 ha) Shearbridge Mill, Listerhills

S/E1.11 (0.62 ha) Main Street, Ling Bob, Wilsden

S/E1.15 (0.98 ha) Dockfield Road, Dock Lane, Shipley

S/E1.12 (4.27 ha) Land adjacent to Manywells Quarry/Industrial Estate, Manywells Brow

S/e1.13 (0.94 ha) Manywells Industrial Estate, Manywells Brow, Cullingworth

Total Allocated Employment Land Lost to Housing – 17.58 hectares

- 3.9 There is also a considerable amount of former industrial land and derelict industrial buildings located across the District which has since been developed for new housing. In addition, a section of an employment zone (allocated in the RUDP), as part of the former Grattan Estate at Paradise Green, is likely to be redeveloped for new housing development with associated playing fields and community facilities. These transformational developments are proceeding at a time when there is relatively less demand for new allocated housing sites. There will be much greater pressure over the plan period to identify the required sites necessary to accommodate the high population growth projected for the District. Furthermore, the projected increase in new housing and population will result in an increased demand for small scale enterprises and local service industries to serve their growing populations. This in turn adds to the employment land requirement.
- 3.10 Bradford District suffers from high levels of unemployment with particular hot spots of social deprivation in Bradford and in parts of inner Keighley. As well as addressing this problem, there is also a need to maintain a continuous growth in jobs within the District. This translates into a significant new supply of land necessary to provide new business enterprises and industry as sources of new employment. The three greenbelt locations referred to in Section 1.1 have the potential to attract new inward investment. They are strategic locations, with the potential to provide variable sizes of development plots which can accommodate flexible business needs on well designed estate layouts with good connectivity. Without these development opportunities it may not be possible to achieve the levels of economic growth necessary to meet future jobs needs and reduce the overall unemployment levels across the District.
- 3.11 As noted above in paragraph 3.1, NPPF recommends that local authorities should “set out a clear economic vision and strategy for their area which positively and proactively encourages economic growth.
- 3.12 Policy EC3 of the Core Strategy sets the distribution of 135 hectares of land across the District with 100 hectares assigned for Regional City of Bradford, 30 hectares in Airedale and 5 hectares in Wharfedale. The distribution is established proportionally to the current population figures for the wards which make up the three sub areas. An economic strategy for major employment sites is derived from the Strategic Core Policies and Sub Area Policies as set out below and a significant quantum of the 135 hectares will be delivered through the three strategic employment sites.
- 3.13 Strategic Core Policy 1 sets the overall approach and key spatial priorities for development, transforming the economic and social conditions in particular for the Regional City of Bradford, the Leeds-Bradford corridor as well as Airedale. Strategic Core Policy 4 sets out the hierarchy of settlements across the District and highlights their economic functions, with Bradford Urban area as the main priority for intervention, followed by the principal towns.
- 3.14 Strategic Core Policy 1 seeks to “optimise opportunities provided by proximity to Leeds and Bradford Airport as an international business gateway for the District”. Provision of a substantial business opportunity on brownfield land, a strategic

employment site in close proximity to the Apperley Bridge rail station underpins this initiative. This proposal is also a principal factor of Sub Area Policy BD1 C for the North East Sector of the Regional City of Bradford, confirming the location of a new employment opportunity. The Airedale Masterplan (PS/E011) also identified Esholt treatment works as an opportunity to release a large area of brownfield land of strategic importance, to create a research and development led technology business park.

- 3.15 New business investment in the District has largely been attracted towards the Bradford South constituency with over 50% of the allocated employment sites now developed. This is largely due to proximity to the motorway network and to other industrial clusters such as the Euroway Trading Estate. All of the larger, more flexible sites have now been taken up and consequently new strategic sites are required with good access facilities to maintain investment in this part of the District.
- 3.16 Policy EC3 proposes the provision of 30 hectares of employment land in the Airedale corridor and 5 hectares in Wharfedale. Airedale has always been, and remains, a place for employment and living. It is classed as a major employment corridor focused on high-tech companies and digital communications. The Airedale Masterplan is a strategy focused on the economy so that it continues to deliver benefits to local people. A key part of this strategy is to provide for and support the development of key employment sites and the main towns are recognised as potential centres for increased economic activity. For the spatial distribution of employment land, the Pennine villages have been included with Airedale because a significant number of the residents travel to Airedale to work rather than to Bradford.
- 3.17 Ilkley is one of the Districts principal towns with its cultural, retail, tourism and leisure functions and close connectivity to both Leeds and Bradford and is therefore a focus for new development. Ilkley has attracted a degree of economic growth in recent years. Only one small allocated employment site in Ilkley remains undeveloped mainly as a result of some physical constraints. There are no alternative sites available in Wharfedale yet there is apparent market demand for sites for small and medium enterprises and for small service, business and finance industries.
- 3.18 In both of these corridors the Principal towns of Ilkley, Keighley and Bingley have developed across the valley bottoms. The topographical limitations for further development means that the allocation of good employment sites that will attract inward business investment can only be found within green belt locations. Development proposals in these locations will also require specific changes to the green belt boundary as exceptional circumstances set out in Section 2 above.
- 3.19 In conclusion the exceptional circumstances on the need to accommodate new land for employment development are based upon the evidence of the employment land supply and market information which suggest in order to achieve the ambitions of NPPF and local ambitions to support economic development the land supply needs to look to new sites within good market areas which have the potential to provide the right mix of sites.



- 3.20 Following the submission of the initial version of this further statement, the Inspector requested a short summary paragraph setting out the exceptional circumstances for green belt change. This is set out below:

The Council consider that exceptional circumstances are justified which require the green belt land to be released in order to meet its development needs for housing in full and in order to support long term economic success of the district. It is clear based on the land supply in the SHLAA that in order to meet the Housing requirement under policy HO1 in full would necessitate change to green belt to accommodate around 11,000 dwellings, given land supply constraints in non green belt land. This is supported by evidence in the growth study that land is available in the green belt in sustainable locations which would also not prejudice the strategic function of green belt. The evidence from the Employment Land Review suggests a limited mix of land of the right size and locations to ensure a quality offer for the plan period with only around 50 Hectares considered still suitable. To this end the plan under Policy EC3 identifies a new land supply of at least 135 hectares needs to be allocated which includes at least 84 hectares of new land currently not within the known supply. To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.

**APPENDIX 3 – SHLAA BASED CALCULATION OF HOW MUCH GREEN BELT MAY BE REQUIRED TO MEET THE HOUSING REQUIREMENT**

	Total Deliverable and Developable Capacity Within SHLAA					Core Strategy Publication Draft Policy HO3 Target (No and % of District Total)		Estimated Max Green Belt Contribution Needed		Green Belt Capacity Within SHLAA (Includes Residual)
	Total Incl. Residual	% Of District Wide Total	A - Total Not Affected By Policy or Physical Constraints (Suitable Now)	B - Total Affected By Policy / Physical Constraints Excl G Belt	C - Total Affected By Policy or Physical Constraints Excl G Belt Reduced By 1/3			No	%	
<b>Total - Regional City</b>	30,338	56.5	13,703	9,241	6,099	28650	68.1	7404	26	7395
City Centre	2,752	5.1	2,523	229	151	3500	8.3	0	0	0
Canal Rd Corridor	3,600	6.7	605	2,995	1,977	3200	7.6	0	0	0
NE	5,171	9.6	2,266	2,309	1,524	4700	11.2	910	19	596
SE	6,607	12.3	2,522	1,249	824	6000	14.3	2654	44	2836
SW	6,180	11.5	3,353	1,274	841	5500	13.1	1306	24	1553
NW	4,745	8.8	1,955	794	524	4500	10.7	2021	45	1997
Shipley	1,283	2.4	480	391	258	1250	3.0	513	41	413
<b>Total - Principal Towns</b>	9219	17.2	2895	2159	1425	6700	15.9	2380	36	4165
Ilkley	1,790	3.3	264	95	62	800	1.9	474	59	1431
Keighley	5,233	9.7	1,657	1,836	1,211	4500	10.7	1632	36	1741
Bingley	2,196	4.1	975	229	151	1400	3.3	275	20	993
<b>Total - Local Growth Centres</b>	5,521	10.3	1,494	2,315	1,528	3400	8.1	713	21	1713
Queensbury	1,748	3.3	512	234	154	1000	2.4	334	33	1002

Silsden	2,026	3.8	263	1,624	1,072	1000	2.4	0	0	139
Steeton	885	1.6	294	362	239	700	1.7	168	24	229
Thornthorpe	864	1.6	426	95	63	700	1.7	212	30	343
<b>Total - Local Service Centres</b>	<b>8,631</b>	<b>16.1</b>	<b>1,311</b>	<b>1,505</b>	<b>993</b>	<b>3350</b>	<b>8.0</b>	<b>1,011</b>	<b>30</b>	<b>5816</b>
Addingham	1,153	2.1	0	476	314	200	0.5	0	0	677
Baildon	884	1.6	334	60	40	450	1.1	77	17	490
Burley	1,094	2.0	0	76	50	200	0.5	150	75	1018
Cottingley	681	1.3	15	33	22	200	0.5	163	82	633
Cullingworth	241	0.4	85	70	46	350	0.8	70	20	87
Denholme	848	1.6	139	195	129	350	0.8	82	24	514
East Morton	301	0.6	19	0	0	100	0.2	82	82	282
Harden	86	0.2	8	78	51	100	0.2	41	41	0
Haworth	696	1.3	191	390	257	500	1.2	52	10	115
Menston	1,167	2.2	401	0	0	400	1.0	0	0	766
Oakworth	496	0.9	42	0	0	200	0.5	158	79	454
Oxenhope	51	0.1	20	0	0	100	0.2	81	81	31
Wilsden	936	1.7	59	128	84	200	0.5	57	28	749