# Local Plan for the Bradford District

Core Strategy (Publication Draft)

Background Paper: 1. Overview

February 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 km2 (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 where 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

Core Strategy Publication Draft (2014) Background Paper 1: Overview 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 LDS is in the process of being reviewed in light of recent national planning reforms, progress on the Local Plan, Local Circumstances and implications of Neighbourhood Planning. A revised LDS will be approved prior to submission of the Core Strategy.

#### **Core Strategy Milestones**

2.11 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** 

- 2.12 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)
- 2.13 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)
- 2.14 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).
- 2.15 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.
- 2.16 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.
- 2.17 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.
- 2.18 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.
- 2.19 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.

2.20 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

- 2.21 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.
- 2.22 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.
- 2.23 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
  - Plan Viability Assessment
  - Growth study
  - Infrastructure Plan Update
  - Strategic Housing Land Availability Assessment (SHLAA) Update
  - Strategic Housing market assessment (SHMA) Update
  - Retail and Leisure Study Update
- 2.24 Further informal engagement was undertaken with key stakeholders in developing the updated evidence base and also on revisions to the Core Strategy.
- 2.25 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.

## 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 on 6 July 2010. This revocation was subsequently quashed by High Court ruling published 10th November 2010 and subject to the then emerging Localism Bill passing into law and further work on the Strategic Environmental Assessment which itself was the subject of consultation.
- 3.3 The Government published the updated SEA of the proposed revocation of the Yorkshire and Humber Plan in September 2012.

- 3.4 An order was laid before Parliament on 29 January 2013 to formally abolish the Yorkshire and Humber Plan from 22 February 2013, with the exception of the regional strategy's green belt policies for York which will be retained until York City Council adopts a local plan defining green belt boundaries.
- 3.5 In anticipation of the impending revocation of RSS, the Leeds City Region Leaders Board approved an Interim statement on 21<sup>st</sup> April 2011 which agreed to continue to follow key elements of the RSS in their ongoing developments plans.
- 3.6 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.
- 3.7 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.
- 3.8 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.
- 3.9 In support of the LCR approach Local Plan lead officers meet bi monthly on Duty to Cooperate matters together with other key bodies including Environment Agency, and the Highways Agency. This informs operational alignment ad coordination of strategic matters across the LCR Local plans. It reports where required to LCR Heads of Planning who in turn report to Directors of Development. Updates are reported to the LCR Leaders Board on Duty to cooperate matters when required.
- 3.10 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.
- 3.11 In line with the LCR agreed approach a draft table which documents the key strategic issues for the Bradford Core Strategy has been prepared and is found in Appendix 1. This is currently working draft and will be updated prior to submission to reflect ongoing consideration of strategic matters under the Duty to Cooperate. A further background paper will be produce when the Plan is submitted setting out how the Council has met the duty to cooperate in preparation of the Core Strategy.

## 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 polices 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 polices 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 <u>Relationship with the other DPDS</u>

- 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 out side 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 <u>Neighbourhood Planning</u>

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
- 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.
- 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 superceeded 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 <u>Sustainability Appraisal (including Strategic Environmental</u> <u>Assessment)</u>

8.1 As required by Section 19(5) of the Planning and Compulsory Purchase Act 20004, 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 where 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 <u>Habitat Regulations Assessment</u>

- 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 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 is supported by a full HRA, February 2014.

## 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 <u>Health Impact Assessment</u>

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 with10 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. This is currently a working draft and will be updated prior to submission.

## 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. This is currently a working draft and will be updated prior to submission.

## **APPENDIX 1**

## WORKING DRAFT: 14/02/2014

## Bradford Core Strategy: Duty to Co-operate

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

The intention of the legislation is that the duty is carried out before councils make formal decisions on plans, with those decisions taking account of the outcome of the co-operation process. The duty applies to local planning authorities but also the following bodies: The table below sets out the latest analysis of issues and proposed actions derived from the discussions held so far with relevant neighbouring LPAS and bodies since the new duty came into force. This information will be central to demonstrating that the duty has been carried out appropriately. This is a working draft and will be updated prior to submission.

Ref	Strategic Issue	Potential Impact	Areas/bodies potentially affected	Evidence	Resolution / Mitigation	Monitoring	Actions / Response	NPPF Para 156 link
Ref	Summary of the issue	Description of why it is an issue for neighbouring authorities	Details of the authorities affected by the issue	Evidence to show there is an issue (including links to source documents)	Details of how the issue can be overcome or managed	How the issue will be monitored including key indicators and trigger points	Agreed actions (including who is to lead & timescale)	Relevant strategic priority in para 156
1 A	Scale and location of new land for homes	Impact on function of green belt	Leeds, Kirklees, Calderdale , Harrogate, North Yorkshire and Craven	Infrastructure Plan Growth study ( includes strategic level green belt assessment) Settlement study	Strategic Housing Land Availability Assessment (SHLAA) sets out constrained potential supply of land in terms of both total quantum (54,0000 dwellings) and distribution. Total	Allocations Development Plan Document revised green belt boundary.	Engage with adjoining Councils in agreeing detailed methodology for green belt review when undertaken through the Allocations DPD.	Housing need

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				SHLAA Bradford District Housing Requirement Study Bradford Strategic Housing Market Assessment	includes large amount of Green belt land (19,000 dwellings). Exceptional circumstances demonstrated to warrant changes to green belt in order to fully meet objectively assessed need and comply with NPPF. Other Local Planning Authorities (LPAs) are not planning to meet any of Bradford Districts need. Growth study informed broad location of selective changes required under exceptional Circumstances to meet need. Criteria in green belt Core policy to inform site allocations site selection to ensure consideration of key functions in making revisions under exceptional Circumstances.			

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1B		Impact on infrastructure (Including transport education and social)	Leeds, Kirklees, Calderdale , North Yorkshire (Highways and education provider) , Harrogate and Craven	Local Infrastructure Plans Transport Study Education plans	Sharing of evidence and information including updates to and content of the Infrastructure Delivery plan. Ensure LCR investment plan, growth Plan and emerging Strategic Economic Plan support strategic growth areas. Detailed choice and Phasing of development sites in allocations DPD. Ongoing work with adjoining Councils in particular on Transport impacts and mitigation ( see below) and on education implications and mitigation. Share information on High Level Aire Sewer with Craven.	Allocations DPD choice of sites for development and supporting infrastructure where required. Monitoring housing completions Monitoring and Updating infrastructure plan	Ongoing liaison and sharing of evidence. Joint working through LCR LEP on strategic infrastructure delivery	Housing need
1C		Scale of housing provision/Meeti	Leeds, Kirklees, Calderdale , Harrogate,	Bradford District Housing Requirement	Plan proposes to meet Districts Objectively assessed needs to 2030.	Annual Monitoring Report (AMR)	Review and assess when available LCR reports on objectively assessed	Housing need

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		ng others needs	Craven and North Yorkshire.	Study Strategic Housing Market Assessment Emerging LCR housing reports on housing markets and objectively assessed need methodology		Allocations DPD 5 year supply delivery housing land	housing need and strategic housing market areas. Ongoing liaison with adjoining councils.	
1D		Travellers and Travelling Show People Provision	Calderdale, Leeds, Kirklees, Wakefield, craven, Harrogate and North Yorkshire	West Yorkshire G & T Study 2008	Updated Local Study of Need in consultation with other councils. Align with methodology and approaches within LCR where appropriate and practicable.	AMR Allocations DPD 5 year supply	Consult adjoining Councils on methodology and approach to update study and share findings.	
2	Scale and location of new land for employment	Potential to prejudice prospects for regeneration in neighbouring areas by diverting investment interest and infrastructure funding	Calderdale, Leeds, Kirklees, craven, Harrogate and North Yorkshire	Employment land study REM Retail and Leisure Study ( 2013) LCR Strategic Economic Plan	Share Retail and Leisure Study. Joint working through Leeds City Region (LCR) Strategic Economic Plan (SEP)	AMR Allocations DPD	Ongoing work through the LCR SEP	Jobs and infrastructure needed

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3	Flood risk in main river corridors (particularly the Aire and the Wharfe)	Development increases flood risk in other areas down stream. In identifying land for development, need to avoid increasing flood risk further downstream and to assess feasibility of safeguarding areas to increase flood storage provision and improve defences.	Leeds, Selby, Craven, Harrogate, North Yorkshire.	Strategic Flood Risk Assessment (SFRA) Level 1 Infrastructure Delivery plan	River Catchment plans Links with local infrastructure plans and provision of blue/ green infrastructure. Site allocation DPD site choices. Use of Sustainable Urban Drainage Systems (SUDS) and work of SUDS approval body when in place	SUDS approval body implementation AMR	On going discussion with Environment Agency to sign off SFRA Level 1 and supporting statement on sequential approach linked to development strategy.	The provision of infrastructure for flood risk
4	(Impact on South Pennine Moors SPA) Potential impacts of growth from individual districts and 'in-	(Adverse impact on South Pennine Moors SPA as a result of scale and location of new development Impacts of	Leeds, Calderdale, Pendle, Kirklees and Harrogate. Natural England Potential impacts relate primarily to South Pennine Moors SPA and	Appropriate Assessment.	Need for sensitive choice of sites and broad locations for development in order to reduce potential for impacts. May be need for further HRA work in relation to individual sites.	Need for better understanding of pressures for recreational use of uplands due to growth and likely increase in visitor numbers, particularly in	Sharing HRA work and background with LPAs and key bodies. Liaise with them in developing further data and mitigation strategy in support of Local Plan. Ongoing work with Natural England on implementation of	Conservation and enhancement of natural environment

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	combination impacts on European Sites	public use and access to the moor as well as loss of supporting habitats and feeding grounds.) Bradford's HRA identifies a range of adverse impacts in relation to emissions, use for recreation, urban fringe impacts and potential for loss of supporting habitats.	SAC, but also to North Pennines and land between SACs and SPAs in North Yorkshire .		Managing and monitoring access to the moors. Need to consider potential for identifying additional areas of habitat and/ or locations for recreation and funding mechanisms to support this. Buffer policy around SPA linked to criteria policy in Core Strategy	relation to honeypot sites eg Rombolds Moor. Joint work (involving Bradford, Kirklees and Calderdale) in relation to bird monitoring is already underway. Early work is being evaluated as part of a rolling programme and will feed into HRA work.	approach.	
5	Pressure on stra	ategic transport ne	l twork					
5A	M62/M621/M6 06	Potential for disruption of traffic flows and capacity issues on the M62 /M621/M606	Highways Agency	Highways Agency's modelling outputs. District Transport Assessment by SDG Ongoing local	LCR SEP investment Local Transport Plan (LTP) investment West Yorkshire Transport Fund Plus Liaison with Highways Agency	AMR	Work with Highways agency to update their transport modelling data and share findings. Liaise with Highways Agency as develop detailed assessment methodology for site	Provision of infrastructure

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				modelling			selection. Ongoing work as part of LCR SEP to ensure coordination of supporting strategic transport investment	
5B	A65	Potential for impact on traffic flows	Leeds North Yorkshire and Craven	SDG transport Assessment	LCR SEP investment LTP investment West Yorkshire Transport Fund Plus	AMR	Liaise with adjoining highways authorities to share corridor information and modelling as well as potential mitigation measures	Provision of infrastructure
5C	Pressure on local transport network:	Potential for impact on traffic flows	Craven, Calderdale, Leeds, Kirklees and North Yorkshire	SDG transport Assessment	LCR SEP investment LTP investment West Yorkshire Transport Fund Plus	AMR	Liaise with adjoining highways authorities to share corridor information and modelling as well as potential mitigation measures	
6	Windfarm development	Cumulative visual impact Need to be able to assess cumulative visual impact plus potential impacts on protected bird species and to weigh these against case for renewable energy.	Calderdale, Kirklees, craven, Burnley, Bury, Lancashire, Rochdale and Pendle Areas just outside the South Pennine Moors SAC and SPA, where wind speeds are still relatively high tend to come	Studies relating to landscape capacity supported by a number of authorities. Also Yorkshire and Humber Renewable Energy Study and equivalent for Lancs authorities.	A draft South Pennine Memorandum of Understanding on Renewable Technologies is currently being debated in the authorities that form part of the South Pennine Renewable Energy Working Group.	Memorandum proposes joint working in relation to setting up and sharing monitoring systems. Work has started on this.	South Pennine Renewable Energy Working Group ongoing liaison and sharing of information.	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

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			under greatest					
7	Minerals	Importation and supply of aggregate and cut stone including supply and wider interactions	pressure. Wakefield, Barnsley, Calderdale, Kirklees, Doncaster, Rotherham Leeds, Hull North Yorkshire Derbyshire	Draft of Local Aggregate Assessment (LAA) for West Yorkshire.	Sub Regional liaison on minerals matters through Yorkshire and Humber Aggregates Working Party (Y&HAWP) and LCR.	Sub regional aggregates monitoring through LAA and Y&HAWP yearly report.	Liaison through the regional minerals meetings (Yorkshire and Humber Aggregates working Party) ; any issues rising under NPPF para 146.1 to be addressed through LAA for West Yorkshire, Y&H AWP Liaison when developing detailed approach in	Provision of minerals
							Allocations DPD.	
8	Green Infrastructure (GI)	Agreement on importance of GI in managing and mitigating impacts of growth and on strategic corridors and assets.	Authorities within LCR supported Green Infrastructure Strategy North Yorkshire Local Nature Partnerships	LCR GI Strategy Regional work led by Natural England	Need to agree role and support for GI where strategic green belt is under particular pressure eg Leeds/ Bradford Corridor/ Tong Valley. Share best practice in relation to defending green space within urban areas and applying multi-functional tests.	Application of NR standards for access to wider areas for informal recreation. Links with Habitat Regulations Work.	Ongoing liaison with adjoining councils and key bodies Link to emerging Local Nature Partnerships	Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. Provision of health infrastructure and

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								other local facilities
9	Waste Management	Cross boundary movement of waste and wider implications	EA, adjoining LPAs plus others who take waste Includes North Yorkshire CC	Waste arisings and waste treatment capacity update Assessment	Sought agreement of recipients of waste that they are planning to support such an approach locally.	AMR Sub regional waste liaison	Ongoing liaison with in sub region and other regional waste groups including North Yorkshire Ongoing liaison with other areas which currently take waste from Bradford. Deal with detailed issues as part of the Waste Management DPD.	Waste Management
10	Green Belt	Long term strategic function of Green belt	Leeds, Kirklees, Calderdale , Harrogate, Craven and North Yorkshire	Growth Study ( includes strategic assessment of green belt function around all settlements) SHLAA	Core Policy seeks to ensure strategic function of green belt is maintained where revisions are made. Plan seeks to establish green belt boundary for full plan period but given constraints of land supply and other environmental constraints is not proposing to allocate safeguarded land. The Long term extent of green belt will need to be addressed through subsequent plans comprehensively across the City Region.	AMR Allocations DPD	Ongoing liaison with other LPAs on emerging plans and implications for scale and extent of green belt in City Region.	Deliver homes

## **APPENDIX 2 Evidence Base**

Evidence	Author	Date	Policies	Key elements
Studies /Technical Assessments				
Settlement Study	CBMDC	2011	SC4 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	SC5 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.
			SC7 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

		the required land supply.
	SC5 Location of Development	1 117
	HO2 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.
	HO3 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	
			HO3 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	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 Housing Requirement Study – Main Report and Addendum	GVA/Edge Analytics	February & August 2013	HO1 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	HO2 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.
			HO3 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 he 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

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		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.
	HO6 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	HO8 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.
			HO11 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)	Levvel	2010	HO11 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	HO12 Provision of Sites for Gypsies, Travellers and Travelling Showpeople	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	<ul> <li>Overview of the economic structure of the District.</li> <li>Assessment of: <ul> <li>the employment land supply;</li> <li>projected demand for employment land over the plan period;</li> </ul> </li> </ul>
			<ul> <li>EC2 Supporting Business and Creating Jobs</li> <li>EC3 Employment Land Requirement</li> </ul>	<ul> <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>
Understanding Bradford District Report	CBMDC	2013	<ul> <li>EC1 Creating a successful and competitive Bradford District economy within the Leeds City Region</li> <li>EC2 Supporting Business and Creating Jobs</li> <li>EC3 Employment Land Requirement</li> <li>EC4 Sustainable Economic Growth</li> </ul>	<ul> <li>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.</li> <li>It provides a broad understanding of the local economy and the economic, social and environmental factors that impact on economic growth in Bradford District.</li> </ul>
Bradford District Wide Transport Study	SDG	2010	HO3 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

				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 form CSFED to CSPD in the A65 corridor.
Viability Assessment of Local Core Strategy FED	DTZ	2013	<b>ID2</b> Viability	NPPF and national Planning Guidance compliant Viability Assessment of the Core Strategy FED which has informed the policies in the Core Strategy PD.
			<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.
Infrastructure Delivery Plan and Baseline Analysis Report	DTZ/ARUP/CBMDC	2013	Sub area Policies	Baseline analysis of key issues affecting the district. Infrastructure Baseline analysis by sub area. Infrastructure Delivery Schedule. Infrastructure Funding Gap.
			<b>ID3</b> Developer Contributions	Infrastructure Delivery Schedule. Infrastructure Funding Gap.
Strategic Flood Risk Assessment Level 1	JBA/CBMDC	2014	SC1 Overall Approach and Key Spatial Priorities HO3 Distribution of Housing Requirement EN7 Development and Flood Risk	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 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	ККР	2006	SC6 Green Infrastructure	Assessment of current provision and deficiencies for range of open space
			EN1 Open Space, Sports and	typologies.

			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
			EN10 Sandstone Supply	location, type, quality and quantity of
			<b>EN11</b> Sand, Gravel, Fireclay and Hydrocarbons	minerals resources within the District.
			EN12 Minerals Safeguarding	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.