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**Report of Director of City Development**

**Report to Executive Board**

**Date: 4 January 2012**

**Subject: Bradford's Core Strategy Further Engagement Draft 2011**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Summary of main issues**

1. Bradford's Core Strategy Further Engagement Draft is out for public consultation until 20 January 2012. Bradford's strategy for dealing with growth is very similar to Leeds, but there are proposals for significant housing development at Holme Wood and Menston which would be damaging to the Green Belt gap between Leeds and Bradford and would generate excessive traffic congestion in Leeds.

**Recommendations**

2. Executive Board is recommended to formally object to Bradford's Core Strategy Further Engagement Draft on the basis that:
  - i) proposals for redrawing the Green Belt boundary to enable development at Holme Wood and Menston would encroach into the strategic gap between Leeds and Bradford leading toward a merging of the two cities.
  - ii) traffic congestion and hazards would be created to roads in Leeds, particularly the A657 and routes to Drighlington and beyond, and the A65.

## **1 Purpose of this report**

- 1.1 This report identifies a number of policies and proposals in Bradford's Core Strategy Further Engagement Draft 2011 which have the potential for significant impact on Leeds. A recommendation is made to submit comments to Bradford as set out in Appendix 1.

## **2 Background information**

- 2.1 Bradford MDC has been preparing its Core Strategy over a number of years and Leeds made comments on the Further Issues and Options stage in 2008. Concerns then included possible urban extensions into Green Belt land in Wharfedale, including Menston, and at Holme Wood and a possible new settlement at Esholt. A further concern was loose wording to their employment growth policy which could be interpreted to accept office development in out-of-centre locations. This could be damaging to Leeds which is trying to focus new office development in to centres, to support their overall health and vitality.
- 2.2 The current consultation on the Further Engagement draft runs until the 20<sup>th</sup> January 2012
- 2.3 The Further Engagement draft sets out detailed plan policies and proposals in a document of over 360 pages, covering the full range of planning matters – locational strategy, housing, employment, green spaces and infrastructure, centres and retailing, Green Belt, regeneration, transport and minerals.

## **3 Main issues**

### Housing location strategy

- 3.1 Like Leeds, Bradford is having to plan for a considerable increase in population and housing growth, but considers that the current state of the housing market warrants a reduction in the requirement. Bradford's approach is to use the housing requirement set out in the RSS, but reduce the annual requirement by 10% for the early years up to 2016. As such, it will be planning to provide for 48,500 dwellings over the plan period to 2028. It expects 3000 dwellings (600 p.a.) to be made up of windfall provision during the years 2023 to 2028. This leaves 45,500 dwellings to be found through planned allocations.
- 3.2 Like Leeds, Bradford's priority is to focus development in areas that would assist regeneration and make best use of previously developed land. However, it is unable to accommodate all of the housing growth in this way and needs the help of an urban extension to south east Bradford and some local Green Belt deletions to the Principal Towns of Ilkley, Burley and Keighley and the smaller settlements. This will involve use of greenfield allocations, safeguarded land (known as "protected areas of search" in Leeds) and Green Belt. The distributions are balanced so that most growth is centred on Bradford (61%), the Principal Towns take a good proportion (17.5%), the Local Growth Centres take 13.5% and the smaller settlements take 7.5%.

- 3.3 In terms of impact on Leeds, significant growth is proposed for South East Bradford which is apportioned 6000 dwellings for the plan period. The Core Strategy is unspecific about how many of these dwellings would form part of the Holme Wood proposals. Recent consultation on the Holme Wood and Tong Neighbourhood Development Plan Consultation draft would suggest an urban extension of some 2700 dwellings. There would also be impact on Leeds from the proposal to apportion 900 dwellings to Menston, which is designated as a "Local Growth Centre".

#### Green Belt

- 3.4 Bradford is proposing a selective review of its Green Belt to accommodate up to 9000 dwellings as local Green Belt deletions related to the settlements forming part of the housing location strategy and an unspecified number associated with an urban extension at Holme Wood. The exact distribution of proposed Green Belt take is not quantified in the Core Strategy draft.
- 3.5 Policy SC7 recognises that the Green Belt has a valuable role in supporting urban renaissance, transformation and concentration of development, as well as conserving countryside. Policy HO7 seeks to minimise the amount of Green Belt land take and to minimise the impact on the landscape context including the character and setting of the settlement. However, no policy acknowledges the role of Green Belt to prevent coalescence of settlements.
- 3.6 On the positive side, Policy BD1 intends to enhance the role of the green belt between Bradford and Leeds as a high quality Country Park for active recreational leisure for residents of both districts.

#### Employment

- 3.7 Policy EC3 notes that Green Belt land may be needed to bolster Bradford's portfolio of high quality employment sites in north Bradford tied to locational benefits of Leeds-Bradford Airport and in South East Bradford to accompany housing development at Holme Wood.
- 3.8 Bradford also expects to allocate some employment land in the Leeds-Bradford Corridor which is recognised by both cities as a regeneration priority.

#### Transport

- 3.9 Analysis of the preferred spatial development option considers that the strategy of growth would place pressure on a number of strategic roads, including the A647 between Leeds and Bradford and the M606 and M62.
- 3.10 Bradford's transport infrastructure priorities that could impact on Leeds include the following:
- Proposed new train station at Apperley Bridge
  - Bus priority corridors as part of new sustainable urban extensions, which would include Holme Wood
  - Road and Rail networks protected and enhanced, specifically for access to Leeds-Bradford Airport

- 3.11 The impact of large scale land releases adjacent Leeds will have a significant transport implications to the district's highway network. Comments made below are within this wider context.
- 3.12 Although not specified in the Core Strategy, the regeneration opportunities and urban extensions for Holme Wood might provide up to 2,700 new homes. This will have a significant traffic impact that will extend into the Leeds District irrespective of any public transport enhancements that could be delivered. The effect of traffic on Leeds' network need to be better understood and Leeds City Council needs to reserve the right to make further representations. The obvious routes into the Leeds District that need to be considered are the A647 Bradford Road to the north of the site, and routes to Drighlington continuing to the SRN and Leeds City Centre.
- 3.13 Many question marks have already been raised by Leeds City Council specifically about the feasibility of delivering the public transport infrastructure needed to support Holme Wood proposals. In summary, these include concerns about the viability of proposed bus services, deliverability of the disused rail line for public transport, the feasibility of providing a new Laisterdyke station on the existing rail network and the appropriateness of the location of the proposed park and ride.
- 3.14 With reference to 900 dwellings apportioned to Menston, road traffic congestion on the A65 corridor from Menston to Leeds would be worsened and the capacity of peak-hour travel on the rail line through Leeds to Menston would be exceeded. In particular, the proposal is likely to generate including safety and capacity concerns at Horsforth Roundabout.

#### Environment

- 3.15 Policy EN4 expects plans and proposals to make a positive contribution towards the management and enhancement of the diversity of recognised landscapes at Esholt, Tong Valley, Rombalds Ridge and Wharfedale. These all link through to or border similar landscapes in Leeds.

#### Retail

- 3.16 As expected Bradford plans to focus most growth in Bradford City Centre with some growth to the Principal Towns too. In terms of smaller centres near to the boundary with Leeds, Policy EC5 says that Greengates and Thornbury should be the focus for convenience retail and limited comparison retail in order to enable people to meet their day to day needs without the need to travel, and will not adversely impact upon the vitality and viability of Bradford City Centre and other nearby Town Centres.

#### Minerals

- 3.17 Policy EN10 provides support for sandstone quarrying in areas to be designated in Bradford's future site allocations plan. Policy EN12 safeguards land for mineral extraction in areas of reserves identified on a map. A number of these areas border the Leeds boundary.

## **4 Corporate Considerations**

### **4.1 Consultation and Engagement**

- 4.1.1 Bradford's consultation lasts until 20 January 2012. The next stage of Bradford's Core Strategy will be to take account of comments received and publish a Submission Plan for further consultation, prior to submission and examination in public.
- 4.1.2 Consultation with Ward Members regarding a specific proposal at Holme Wood, arising from a separate consultation on a neighbourhood plan, indicated concerns for the loss of green belt and the traffic implications of development on the Leeds boundary.

### **4.2 Equality and Diversity / Cohesion and Integration**

- 4.2.1 An EDCI Screening Form has been completed. It notes that the visual and character impacts of Green Belt incursion and the traffic impacts in Leeds might pose issues for health, but none of the impacts weigh disproportionately upon any one equality group.

### **4.3 Council Policies and City Priorities**

- 4.3.1 None of relevance

### **4.4 Resources and Value for Money**

- 4.4.1 Not applicable

### **4.5 Legal Implications, Access to Information and Call In**

- 4.5.1 Not applicable

### **4.6 Risk Management**

- 4.6.1 No risks

## **5 Conclusions**

- 5.1 Overall, Bradford's Core Strategy Further Engagement Draft sets out a vision and approach that will be positive for the Leeds City Region, particularly in terms of its general housing strategy that prioritises the main urban areas and previously developed land first. However, the proposals to take Green Belt land for development at Holme Wood and at Menston are considered to be harmful to Leeds. Bradford's Core Strategy offers no recognition of the important role of Green Belt to prevent neighbouring settlements from merging into each other. If it did, the Holme Wood and the Menston proposals could lead to coalescence of parts of Leeds and Bradford. Also, highway congestion and potential safety hazards would be created on roads in Leeds.

## **6 Recommendations**

6.1 Executive Board is recommended to formally object to Bradford's Core Strategy Further Engagement Draft on the basis that:

i) proposals for redrawing the Green Belt boundary to enable development at Holme Wood and Menston would encroach into the strategic gap between Leeds and Bradford leading toward a merging of the two cities.

ii) traffic congestion and hazards would be created to roads in Leeds, particularly the A657 and routes to Drighlington and beyond, and the A65.

## **7 Background documents**

7.1 Completed representation forms

7.2 Bradford's draft Core Strategy

7.3 EDCI Screening Form