Core Strategy Partial Review

Scoping Report

January 2019





Bradford Local Plan Core Strategy: Partial Review

Scoping Report

January 2019

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Scope of the consultation

What is this document?	This document sets out the scope of the Bradford Core Strategy Partial Review (CSPR). It identifies which policies will be reviewed and the key issues relating to those policies. It also sets out the key considerations that the Council will need to take into account when identifying the possible options for addressing these issues, along with the evidence required to inform these options.
Purpose and scope of the consultation:	We are seeking views on the scope and direction of the CSPR. Any comments provided will be considered and where appropriate be used to help shape the revised policies, along with the requirements of the National Planning Policy Framework (NPPF) and planning guidance.
Geographical scope:	The proposals in this document relate to the Bradford District.
Impact assessment:	A number of impact assessments will support the preparation of the CSPR, including:
	Sustainability Appraisal (SA) (including Strategic Environmental Assessment (SEA)) – Scoping Report: The SA is used to assess the proposed plan to determine if it will help to achieve relevant environmental, economic and social objectives. The Scoping Report will set out the objectives and will include an updated section on baseline data.
	Habitats Regulation Assessment (HRA) – Scoping Report: At this stage this report provides a summary and review of the adopted Core Strategy HRA and details any relevant case law updates as well as the next steps that will be carried out as the preparation of the plan progresses.
	Equalities Impact Assessment (EqIA) – Scoping Report: The EqIA is used to assess the impact of the proposed policies on different groups in the community. At this stage the scoping report sets out the parameters which will be used to assess the plan.
	Health Impact Assessment (HIA) – Scoping Report: The HIA is used to assess the impact of the proposals on people's health. At this stage, the scoping report sets out evaluation frameworks for supporting sustainable healthy communities through policies and allocations.

Basic information

Timescale of consultation:	This consultation will begin on 11 January 2019 and end at 5pm on 22 February 2019.	
How to respond	The consultation will be carried out in accordance with the Council Statement of Community Involvement (SCI) and national guidance.	
	The consultation documents will be made available on the Bradford Council website. Paper copies of the documents will be provided at the following locations and will be available to view during normal opening hours:	
	Britannia House Bradford City Library Bradford Local Studies Library Keighley Town Hall Keighley Library Shipley Library Bingley Library Ilkley Library	
	If you wish to make a representation to the consultation please visit: www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/ to complete the online survey or download documents, including the electronic comments form. To assist in the swift and cost efficient processing of representations we are encouraging the use and completion of the online survey.	
	email: planning.policy@bradford.gov.uk	
	(Please title your email 'Core Strategy Partial Review')	
	Post: Core Strategy Partial Review, Department of Place, Local Plans Team, 4 th Floor, Britannia House, Bradford, BD1 1HX	
Enquiries	If you have any enquiries regarding this consultation please contact the Local Plans Team.	
	Email: planning.policy@bradford.gov.uk	
	Phone : 01274 433679	
Confidentiality and	Data Protection Act 2018	
data protection	Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 the personal information you provide will only be used by the Council for the purpose of preparing the Local Plan.	

Local Plans Privacy Statement

Sets out how the City of Bradford Metropolitan District Council (CBMDC) Local Plans team processes your personal data. This notice should also be read in conjunction with the Council's Corporate Privacy Notice and other specific service notices, which are available to view at: https://www.bradford.gov.uk/privacy-notice/

Overview

Bradford Core Strategy Partial Review: Helping Shape Our Future Policies

- 0.1 The Bradford District is a varied and exciting place to live and work. We want to ensure that our strategic planning polices remain fit for purpose and will support sustainable development now and into the future.
- O.2 The Council is starting work on the partial review of its adopted Core Strategy. The Core Strategy forms an essential part of the Local Plan for Bradford setting out our strategic housing, employment, transport, retail, leisure and environmental policy requirements and also importantly the policy context for the location, scale and distribution of site allocations. We also use the Core Strategy policies to help determine planning applications and identify infrastructure and investment priorities.
- 0.3 The review has been stimulated following recent updates to national planning policy, particularly in relation to assessing housing need and setting consequent housing requirements, the continued protection and enhancement of green belt and local policy changes including the adoption of a new economic strategy for the district and a focus upon major transport projects, including Northern Powerhouse Rail. The Council's Executive adopted a revised Local Development Scheme (LDS) in July 2018, which detailed the need to undertake a partial review of the core strategy and twin track the work programme with the development of the Allocations DPD.
- 0.4 As the Core Strategy is such an important document it is vital that the Council reviews it and makes sure it is relevant and up to date for our local area.
- 0.5 The first stage of consultation involves establishing the range of existing adopted core strategy policies which may require reviewing. The Council welcomes feedback on our initial directions. This consultation is an early opportunity to help shape Bradford's planning polices for the future.
- 0.6 The main policy areas included in the Core Strategy Partial Review include:
 - The Core Strategy plan period national policy indicates that the plan should look ahead over a 15-year period. The current Core Strategy plan runs until 2030. It is proposed that the new Core Strategy plan period should be extended from 2030 to 2035.

- Strategic housing policies including setting a new housing requirement (including specialist accommodation needs), the distribution and phasing of housing across the district, reassessing the levels of affordable housing need and the targets for the delivery of housing on previously developed land, providing more detail on housing quality, including potentially introducing optional housing standards, and considering whether all brownfield and non-green belt land options have been fully and extensively evaluated, when it comes to accommodating sustainable development.
- Economic growth reassessing employment needs and land requirements plus reviewing retail and leisure needs. The council wants to enable a strong and vibrant economy to flourish and businesses need land and premises to support jobs. We need to ensure that the right mix of land is available, in the right locations for a wide range of different businesses.
- Green Belt re-assessing the case for exceptional circumstances and identifying the need for any changes to Green Belt boundaries. National planning policy places great importance to Green Belts. Council's need to demonstrate exceptional circumstances for changes to Green Belt through plan-making. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.
- Viability ensuring that our delivery and viability policies align with national policy on addressing viability considerations at the plan-making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.
- 0.7 A number of pieces of technical evidence have been or are in the process of being commissioned including a new Strategic Housing Market Assessment (SHMA) and Local Housing Needs Survey, evidence on employment, transport, retail and leisure, flood risk and other technical areas. Technical work on the evidence base is also been undertaken in house by the Council, including Green Belt analysis and employment and housing land assessments.
- The consultation takes place over 6 weeks and starts on Friday 11th January and ends on Friday 22nd February 2019 at 5pm. If you wish to make a representation to the consultation please visit: www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/ to complete the online survey or download documents, including the electronic comments form. The details of supporting public information events are also available on the Council's website.
- O.9 Any information we receive will be processed in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

This is your opportunity to help shape our future planning policies. Please take the time to review this document and supporting papers carefully. Any queries please do not hesitate to get in touch. Thank you for your input.

1. Introduction to the Partial Review

What is this publication about?

- 1.1 The Bradford Local Plan Core Strategy was adopted on 18 July 2017. It sets out the strategic planning framework for the District to guide development in the period between 2013 and 2030.
- 1.2 It includes planning policies which cover a range of strategic issues such as housing, employment, retail, transport, infrastructure and the environment, as well as more detailed thematic policies. The Core Strategy forms part of the Local Plan for Bradford and is one of the key documents used to determine planning applications for new development and inform investment decisions for new infrastructure.
- 1.3 A number of other Development Plan Documents (DPDs) sit alongside the Core Strategy. Several of these were also adopted in 2017, namely: the Shipley and Canal Road Area Action Plan (AAP); the City Centre AAP; and Waste Management DPD; providing specific planning policies for these areas.
- 1.4 Due to changes in national policy and also changes in local circumstances it is considered that a partial review of the Core Strategy is necessary to ensure that the strategic policies remain up-to-date and effective. The Local Development Scheme (LDS) sets out the project plan for the preparation of the Local Plan for the Bradford District and was approved by the Council in July 2018. The LDS includes a brief headline profile of the scope of the Core Strategy Partial Review (CSPR), setting out at the time of publication the main policies which will be reviewed and the timescales for key stages of the work.
- 1.5 This CSPR forms the start of the work to fulfil the requirements of Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended), and establishes the key policies to be reviewed and critical issues to be addressed. The specific outputs from commissioned work on housing, employment and other technical evidence is not available at this time but will inform option development and the subsequent drafting of a Preferred Option Report, which will establish the Council's preferred approach to addressing the issues set out in this publication.
- In addition to the Core Strategy Partial Review the Council is also preparing the Site Allocations DPD. This will allocate sites to meet the development needs of the area (outside of the areas covered by the Area Action Plans), as well as protecting those sites that are designated for their environmental value. It is therefore important that the CSPR is carried out in a timely fashion to establish the strategic development needs of the District and provide a clear strategy for allocating sufficient land to meet the District's development needs over the plan period. Upon adoption, the Site Allocations DPD and Core Strategy will supersede the remaining saved policies of the Replacement Unitary Development Plan (RUDP) and form the composite Local Plan for Bradford District.

Why are we carrying out a partial review of the Core Strategy?

- 1.7 The National Planning Policy Framework (NPPF) (paragraph 33) indicates that policies in local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Although the Core Strategy was only adopted in 2017 the Council needs to consider whether any of the policies need to be revised in light of new evidence or changes in local circumstances. Consideration also needs to be given to the effectiveness of the adopted policies to identify whether they are performing as intended or whether they need to be altered.
- 1.8 There have been a number of key changes to the planning system in the last year. On 24 July 2018 the government published the revised National Planning Policy Framework (NPPF). This sets out revised policies for a number of key areas of planning. In particular: the way local authorities determine their housing requirement, the definition and approach to the provision of affordable housing, making the most efficient use of land and how changes to green belt boundaries are evidenced and justified. The government has also published revised Planning Practice Guidance to take account of the changes made to the NPPF. Subsequent announcements indicate that further amendments are likely to be made in the coming months.
- 1.9 The introduction of the standard methodology for assessing local housing needs, along with the release of new household projections (although the Government has advised through a new consultation that these should not be used in the standard method at this time), are key drivers for undertaking the partial review of the Core Strategy.
- 1.10 The standard methodology provides the starting point for calculating the amount of housing that is needed within the District. However, it does not take account of other government policies or economic circumstances which may influence the amount of housing that is needed. The partial review will need to take account of these factors and consider whether an appropriate uplift should be applied when looking at the different options for setting a new housing requirement for the District.

New Local Policy Directions

- 1.11 There have also been some local changes which will need to be taken into account by the partial review. These are focused around a series of new Council strategies and evidence on the economy, transport and housing.
- 1.12 The Bradford Economic Partnership has recently reviewed and published a new Economic Strategy for the District. It sets out the growth ambitions up to 2030 and has been endorsed by the Council. This, along with the work being carried out by the Leeds City Region LEP and the West Yorkshire Combined Authority will shape the future economic direction of the District. In addition the potential economic opportunities from Northern Powerhouse Rail could see significant growth which

needs to be supported by the partial review of the Core Strategy and Site Allocations DPD.

The Scope of this Partial Review

- 1.13 This consultation document aims to provide a more detailed look at the key issues that will be addressed through the partial review. The key areas for review are:
 - The Core Strategy plan period national policy indicates that the plan should look ahead over a 15-year period. The current Core Strategy plan runs until 2030. It is proposed that the new Core Strategy plan period should be extended from 2030 to 2035.
 - Strategic housing policies including setting a new housing requirement (including specialist accommodation needs), the distribution and phasing of housing across the district, reassessing the levels of affordable housing need and the targets for the delivery of housing on previously developed land, providing more detail on housing quality, including potentially introducing optional housing standards, and considering whether all brownfield and non-green belt land options have been fully and extensively evaluated, when it comes to accommodating sustainable development.
 - Economic growth reassessing employment needs and land requirements plus reviewing retail and leisure needs. The council wants to enable a strong and vibrant economy to flourish and businesses need land and premises to support jobs. We need to ensure that the right mix of land is available, in the right locations for a wide range of different businesses.
 - Green Belt re-assessing the case for exceptional circumstances and identifying the need for any changes to Green Belt boundaries. National planning policy places great importance to Green Belts. Council's need to demonstrate exceptional circumstances for changes to Green Belt through plan-making. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.
 - Viability ensuring that our delivery and viability policies align with national policy on addressing viability considerations at the plan-making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.
- 1.14 There are also likely to be consequential amendments to other policies arising from the main policy review.

Evidence Base Updates

1.15 Parts of the existing evidence base used to support the development of the Core Strategy now need to be updated. New evidence is being progressed and commissioned to support the partial review of the Core Strategy and the Site Allocations DPD. This includes:

Housing, Economic Development and Strategic Policies

- A new Strategic Housing Market Assessment (SHMA) and Local Housing Needs study;
- Updates to the Strategic Housing Land Availability Assessment (SHLAA);
- A new Employment Needs Assessment and Land Review (ELR);
- Retail and Leisure Study;
- Green Belt selective review.

Environment and Recreation

- An updated Strategic Flood Risk Assessment (SFRA);
- Open Space Assessment;
- Playing Pitch Strategy (PPS);
- Review of existing landscape evidence
- Habitat related surveys (including bird and visitor surveys)

Transport, Implementation and Delivery

- Updated assessments of local infrastructure requirements;
- Transport modelling;
- Updated Local Plan Viability Assessment.
- 1.16 Further evidence updates may be required as the Core Strategy Partial Review and Site Allocations DPD work progresses. Information on the current evidence base updates is detailed in **Appendix 1**.
- 1.17 As part of this consultation, the Council has also published an initial Sustainability Appraisal (SA) Scoping report; Habitat Regulations Assessment (HRA) Scoping Report; together with initial Health Impact Assessment and Equalities Impact Assessment scoping reports.

Structure of this Consultation Publication

1.18 Figure 1 below sets out the key sections of this consultation report.

Figure 1: Sections of the report

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 Sets out the policy review, 	identifies the key issues and the approach
to options.	

- Looks at whether additional policies may be needed and where minor amendments may be required.
- Provides a timetable for the preparation of the partial review.
- Provides details of the impact assessments (SA, SEA, EqIA, HIA).
- Looks at Duty to Cooperate issues.
 - Provides details of how to comment on the report.
 - Looks at the next steps following the consultation.

2. Core Strategy Partial Review - Scoping the Policies

Introduction

- 2.1 This section of the consultation document sets out the extent of Core Strategy policies which the Council considers necessary to review. This builds upon the initial directions set out in the adopted Local Development Scheme (LDS).
- 2.2 **Appendix 2** contains a full list of the Core Strategy policies and shows those which will be reviewed and those where no review is necessary at this time. This work has been informed by an assessment of the Core Strategy policies against the requirements of the new National Planning Policy Framework (NPPF) and new local policy directions.

How to use this section

- 2.3 The tables below provide details of those policies that will be reviewed. In each table:
 - the first column summarises the current policy position and sets out the issues which need to be addressed;
 - the second column highlights the key evidence-base documents which will need to be prepared to inform the revised policy, and
 - the final column provides details of the factors which need to be considered when determining the approach to revising the policies.

Updating Our Plan Period

Table 1 The I	Plan Period		
Current Position and Key	y Issues	Local Plan Evidence Updates	Considerations and Approach
2013 (the base date) and of Key Issues: The NPPF (paragraph 22 should look ahead over a adoption. The Core Strategy Partial new plan period to comply Furthermore, the eviden approach will have timeson	gy plan period currently runs from covers the 17 year period to 2030. 2) indicates that strategic policies a minimum 15 year period from I Review will need to establish a with this requirement. Ince used to justify the policy cales that look beyond 2030, so it is policies in the plan reflect this	Strategic Housing Market Assessment (SHMA) and Economic Forecasting The SHMA will look at the housing needs of the District up to 2035 using demographic data from the population and household projections. It is anticipated that a similar forecasting period will be used for the economic forecasting.	Considerations: The Council will need to consider the timeframes of the new evidence base when looking at the plan period. It will need to look at the pros and cons of having a shorter or longer plan period and how this fits with the Site Allocations DPD and other strategic issues such as the protection of the Green Belt and provision of Safeguarded Land. Approach: It is likely that the new Core Strategy plan period will be aligned with the evidence base and would run for a 15 year period to 2035 from the anticipated date of adoption in 2020.

Our Housing Requirement

Table 2 Policy HO1: The District's Hou	sing Requirement	
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
Current position: Policy HO1 establishes the housing requirement for the District for the period 2013-2030. It indicates that a minimum of 42,100 homes should be provided, which equates to a minimum of 2,477 dwellings per annum. This figure was based on demographic evidence including data from the 2011 Census and 2012-based population projections as well as the 2008 and 2011 household projections. Market signals and evidence relating to economic growth was also used to inform the housing requirement. This approach was aligned with other Local Plans within the Leeds City Region. Key Issues: The revised NPPF indicates that the minimum number of homes needed in an area should be established in strategic policies and should be informed by a local housing need assessment, conducted using the standard methodology set out in national planning practice guidance (NPPG). Using the 2014—based household projections, the Government published, in September 2017, an indicative	Strategic Housing Market Assessment (SHMA) and Local Housing Need Study The Council has recently commissioned consultants to prepare a new SHMA and Local Housing Need Study to help inform the Core Strategy Partial Review and set out recommendations for establishing the local housing requirement figure. The SHMA will carry out the local housing need assessment using the standard methodology. This will set the minimum number of homes needed in the area. The study will also look at different economic and demographic evidence and make recommendations on whether a higher housing need figure is justified.	Work is progressing on the new SHMA but the outcomes are not known at this stage. The Council is considering whether the local housing requirement should be set to reflect the standard methodology figure or whether there is a need for an uplift to take account of economic growth issues. Consideration will also need to be given to historic delivery rates, the Duty to Co-operate with neighbouring local authorities and the sustainability implications of different growth levels.

over the period 2016-26, indicates a need of **1,663** dwellings per annum¹.

The Government is currently consulting on a change to the **standard methodology** which was designed to identify housing need in a straightforward and transparent way. This is because the release of the 2016-based household projections showed a significant reduction in household growth across the country and was considered incompatible with the Government's house building target and policies for housing growth.

The local housing needs figure for Bradford is therefore likely to change when the revised methodology is finalised. It is therefore important to consider how this change will influence the review of Policy HO1.

The NPPG indicates that there may be circumstances where a higher housing figure than that produced by the standard method may be considered. It states that the government is supportive of authorities who want to plan for growth and acknowledges that the standard method does not predict the impact that changing economic circumstances or other factors may have on local demographics.

The **final housing requirement**² in an area may therefore be higher when such factors are taken into account.

Strategic Housing Land Availability Assessment (SHLAA)

The SHLAA can help to provide information on the availability of potential housing sites and past trends on housing completions. This can be used to help show the range, location and type of land available and annual average levels of housing that have been delivered in the District.

The Council has also recently published a <u>technical update paper on</u> housing supply and delivery.

Employment Needs Assessment and Land Review (ELR)

The Council is commissioning an Employment Needs Assessment and Land Review to look at the objectively assessed needs for employment development in the District.

This study will examine the interrelationships between housing

- Produce updated local housing, demographic and economic evidence to assess whether there is justification for any uplift to the baseline local housing need figure.
- Update the current housing land supply position including taking account of completions and planning permissions since the start of the plan period.
- Consider the extent to which the local housing need figure can be met within the District.
- Consider the implications on the housing requirement from the reoccupation of empty homes and any stock lost through clearance/demolition.
- Establish an overall housing requirement for the plan period.

¹ As part of the 2017 consultation on 'Planning for the right homes in the right places', the Government publish a set of preliminary figures which showed the local housing need calculated using the standard methodology. These figures can be found in the <u>consultation material</u>.

Some of the factors which can be taken into account when considering any uplift of the base minimum housing need figure produced by the standard methodology are:

- Growth strategies which identify that additional housing is needed to support economic growth in an area.
- Planned strategic infrastructure improvements which would support the provision of new homes.
- Previous delivery levels which have been above the minimum need figure and may show that there is a greater need for housing in the area.
- Findings from the Strategic Housing Market Assessment (SHMA) may identify additional housing need above and beyond that identified by the standard methodology.

The Council has ambitions for economic growth and will have to consider whether any uplift above the baseline housing needs figure is required and the scale of any uplift when setting the new housing requirement in Policy HO1.

A range of economic and demographic evidence will need to be used to establish a local housing need figure for Bradford as well as taking account of the factors described above and the revised evidence base.

and economic forecasts and explore how potential changes in scale and distribution of the employment requirement may affect the scale and distribution of the housing requirement.

Bradford District Plan

The Bradford District Plan sets out a number of ambitions for the area. One of the key ambitions is to have highquality homes in neighbourhoods where people want to live.

The Plan supports the need to increase the rate of house building to provide a range of accommodation including affordable housing and higher-value properties.

² The standard method will identify a minimum annual housing need figure. However, it does not produce a housing requirement. In setting the overall housing requirement the Council must also consider the extent to which the identified housing need (and any needs that cannot be met within neighbouring areas) can be met within the District over the plan period, including factoring in constraints such as protected designations, Green Belt and the availability and supply of land.

The Right Level of Growth in the Right Places

Table 3 Policy HO3: Distribution of H	ousing Development	
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
Current position: Policy HO3 sets out the distribution of the housing requirement across the District: Regional City of Bradford = 66% Principal Towns = 16% Local Growth Centres = 12% Local Service Centres = 6% The distribution reflects the hierarchy of settlements established in Policy SC4, which directs the majority of growth to the Regional City of Bradford. The policy also divides the requirement down to individual settlements. A number of factors and general principles were used to determine how the requirement should be distributed across the District. These included: General Principles Alignment with Core Strategy Vision and Objectives Alignment with the Settlement Hierarchy Maximising the Benefits of Development and Growth Minimising the Impact on Critical Environmental Assets.	Strategic Housing Market Assessment (SHMA) and Local Housing Needs Study Evidence from the new SHMA will set out the housing needs for different parts of the district. It will use data relating to the need and demand for housing to highlight the areas where new housing is required. This information may show that there needs to be a change to the existing distribution of the housing requirement. Strategic Housing Land Availability Assessment (SHLAA) Evidence from the SHLAA will show where the available, deliverable and developable land supply is located. This information can be used to identify whether there is sufficient land to meet the housing needs in each settlement. This may influence how the housing requirement should be distributed.	Potential considerations are likely to include whether the Council maintains the current distribution as set out in Policy HO3 of the adopted Core Strategy, or aligns distribution of growth to reflect a range of issues including new evidence on housing need, Green Belt, site availability and deliverability, flood risk, and

Other factors

- Transport and Infrastructure
- Population distribution
- Land supply
- Bradford Growth Assessment
- South Pennine Moors Birds and Habitats Surveys
- Flood Risk and the sequential approach
- Maximising the use of previously developed land/minimising Green Belt release/delivering affordable housing.

Key Issues:

Any change to the overall housing requirement in Policy HO1 may, when combined with other evidence updates, lead to a change in the distribution. This may mean that some settlements will see a reduction in the amount of housing that needs to be provided whilst other settlements may see an increase.

The findings from the new SHMA will be important to establish any changes to the distribution of housing.

The availability and deliverability of land for new residential development will also be important considerations when assessing where new housing should be located. Data on housing completions since the start of the plan period will also need to be taken into account.

Consideration will need to be given as to whether there have been any changes to the factors used to determine the previous distribution in the Core Strategy, including any related changes in national planning policy, and whether

Green Belt Review

The Green Belt Review will be used to assess areas of the Green Belt against the five purposes set out in national policy, to determine how it is currently contributing to those purposes. It will identify whether there are areas which perform weakly against the purposes and make an assessment as to whether these areas could be released where exceptional circumstances can be demonstrated.

Viability

Work will be commissioned on site delivery and viability to ensure there is a fit between the headline distribution of housing and implementable sites.

Strategic Flood Risk Assessment (SFRA)

An update to the Council's SFRA level 1 Report will be undertaken. This will allow the Council to re-assess how best to direct development away from areas of highest flood risk in line with the sequential approach required by the NPPF.

- in each settlement since the start of the plan period.
- Explore options through the SHLAA database and other sources to maximise brownfield site development options.
- Following a thorough review of brownfield site options, density considerations and Duty to Cooperate discussions, look at the outputs from the Green Belt review and consider whether there is a potential need to release areas of land in those settlements which require additional sites to meet their housing needs.
- Sites will be reviewed for delivery and viability.

these are of a level which would result in an alteration to the distribution.	
The new NPPF has revised the Government's position in relation to the use of Previously Developed Land (PDL). It places a stronger emphasis on maximising the use of brownfield sites. When looking at the distribution of new housing consideration will need to be given to the location of deliverable brownfield sites.	

Delivering the Right Amount of Housing at the Right Time

Table 4 Policy HO4: Pha	Policy HO4: Phasing the Release of Housing Sites		
Current Position and Key Issues		Local Plan Evidence Updates	Considerations and Approach
This policy set out the approach to the phousing land within the District. The plan policy phases and the policy requires the Site to allocate sufficient land to meet 8/15 requirement in the first phase and 7/15 in the It also sets out the principles that should Allocations DPD to trigger the release of land Key Issues: The NPPF does not specifically require the of housing land, although it is acknown applications for large housing development phasing plans to ensure the managed of homes to the market. The time periods and phasing of the house will need to be reconsidered looking at up from the SHLAA relating to the availability of looking at market demand. The phased related is one way to ensure the sustainable the District, however, it can also have implementations and these need to be careful.	eriod is split into Allocations DPD of the housing e second phase. be used in the d. phased release nowledged that ints may include delivery of new sing requirement odated evidence of sites and also ease of housing development of olications on the	Strategic Housing Land Availability Assessment (SHLAA) The SHLAA is currently being updated and once finalised will provide a detailed list of those sites which have the potential to be delivered for housing in the future. It will establish when each site is likely to become available and this information can be used to help determine whether a phasing approach is required.	Considerations: The Council will need to consider whether it is still appropriate to require the phased release of housing sites (and if so through what approach) or whether there is an alternative way of ensuring the managed delivery of new housing in the District, plus any associated infrastructure.

Maximising Brownfield Sites to Build New Homes

Table 5 Policy HO6: Maximising the U	Policy HO6: Maximising the Use of Previously Developed Land (PDL)		
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach	
This policy sets out the approach to delivering the maximum amount of housing on previously developed land (PDL). The policy sets an overall District wide target of achieving 50% of new housing on PDL. It also sets out more specific targets for the four settlement hierarchy tiers: Regional City of Bradford: 55% Principal Towns: 50% Local Growth Centres: 15% Local Service Centres: 35% Key Issues: The NPPF (paragraph 117) requires strategic policies to set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land. The Government has increased the priority for reusing PDL in the new NPPF. However, it does not reintroduce a sequential approach to site selection and it must be acknowledged that it is likely that there will still need to be significant Greenfield development to meet the housing requirement in Bradford.	Strategic Housing Land Availability Assessment (SHLAA) The SHLAA sets out the amount of land available for new housing development which is deliverable or developable. It categorises the land into Brownfield and Greenfield. This information can be used to determine whether there is sufficient deliverable PDL to meet the housing requirement or whether there will still need to be some Greenfield development. The information can also be used to help revise the PDL targets.	Considerations: The Council will need to consider the level of priority it gives to the development of previously developed land and how this is balanced with the deliverability of sites. Approach: It will need to determine whether the targets set for development on PDL (district wide and at the settlement hierarchy level) are still appropriate or whether there have been significant changes which will warrant revised targets.	

Building the Right Types of Homes

Table 6 Policy HO8: Housing Mix		
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
Current Position: Policy HO8 looks to support the provision of a mix of housing to meet the needs of the District's population. It sets out the following strategic priorities for the types and sizes of housing that are needed: • More family housing • Sufficient affordable housing to meet the needs of people on lower incomes and first time buyers • Increase the supply of larger homes • Increase the supply of accessible homes • Increase the supply of high quality flats • Support the provision of specialist accommodation for older people. Key Issues: The NPPF requires that the housing needs of different groups in the community are assessed and reflected in planning policies (Paragraph 61). It will be important to identify what types, sizes and tenures are required and which groups have a priority need. The NPPG provides additional guidance on how to assess the need of particular groups of people.	Strategic Housing Market Assessment (SHMA) and Local Housing Needs Survey The SHMA will identify the types and sizes of homes which are required to meet the housing needs of the District. A new household survey will be carried out to obtain up-to-date data on the local population, specifically regarding income levels, current housing costs, household size and future aspirations. Demographic data will be used to assess the future housing needs and demands for different groups. This information is particularly important for planning for housing for older people, families, and people with specific housing needs. A Place to Call Home The Housing and Homelessness Strategy (2014-2019) sets out the vision, priorities and approach for meeting the housing needs of the District. The strategy is likely to be updated shortly and will be informed by the SHMA and Local Housing Needs survey.	Considerations: The Council will need to consider whether to retain the current housing mix priorities in Policy HO8 or change them based on the findings of the new SHMA. Approach: In reviewing Policy HO8 the Council will look to: Use the evidence from the new SHMA to identify the different types and sizes of housing that are needed in the District. Use this information to prioritise the housing needs of different groups in the District.

Building Good Quality Homes

Table 7 Policy HO9: Housing Quality		
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
 Current Position: Policy HO9 aims to ensure that new residential developments: Are high quality in terms of design and sustainable construction standards. Are designed to be accessible and adaptable to support the changing needs of different groups of people. 	The (NPPG) states that councils will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in the Local Plan. LPAs should also consider the impact of using these standards as part of their Local Plan viability assessment.	Considerations: In reviewing Policy HO9 consideration will need to be given to the range of possible standards which could be incorporated into the policy Approach:
 Provide private outdoor space. Provide suitable space standards appropriate to the type of home. 	New evidence has been prepared to look at the possibility of introducing new housing standards in the review of the local plan.	There are different levels of standard which new development could meet these include:
 Provide adequate storage for bins, recycling and cycles. Key Issues: Local planning authorities can set additional technical requirements exceeding the minimum Building Regulations in respect of optional nationally described space, access and water standards for new homes. Space Standards - Nationally Described Space Standard. A single standard for minimum internal space requirements is set out by national guidance and applies across all tenures. 	Housing Research Study The Council commissioned David Lock Associates to prepare a study which assessed the case for including new national housing standards in the local plan. The study assessed the need for introducing space and access standards along with the impact this may have on the viability of new developments. The study concluded that there is a need for housing to suit different	 The minimum statutory standards as set out in Building Regulations. The Nationally Described Space Standard. Setting a percentage target for new housing – required to meet M4(2) Category 2: Accessible and adaptable dwellings and M4(3) Category 3: Wheelchair user dwellings based on need and viability. Applying tighter water efficiency standards. It will be important to demonstrate

Accessible Housing Standards

In relation to accessible housing, national guidance states that if a council chooses to adopt additional standards in relation to accessible housing, then they can relate only to 2 categories, and a target percentage should be set for each category. These categories are;

- M4(2) Category 2: Accessible and adaptable dwellings
- M4(3) Category 3: Wheelchair user dwellings.

Water Standards

All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out <u>Local Plan</u> policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

The NPPG indicates a viability assessment should be carried out to ensure that policies (including additional housing standards) are realistic, and that the total cumulative cost of all relevant policies will not undermine the deliverability of the plan.

sections of the population; that new developments need to meet access and space standards as the existing housing stock is difficult to adapt; and with evidence of overcrowding the application of space standards would help to provide more suitable accommodation for multigenerational households. The study also included commentary on the viability of applying space and access standards to new developments.

Strategic Housing Market Assessment (SHMA) and Local Housing Needs Survey

The SHMA will consider the needs of different groups of people looking at whether certain groups require more accessible or adapted homes. This evidence can inform a set of standards which can be incorporated into the policy.

Local Plan Viability Assessment

The Council will update its Local Plan viability evidence to test the impact of a range of policy options, including optional housing standards.

that the chosen standards do not adversely impact upon the viability of housing schemes or the deliverability of the plan and identify in what circumstances they will apply.

An Affordable Home for Everyone

Table 8	Table 8 Policy HO11: Affordable Housing		
Current Position and Key Issues		Local Plan Evidence Updates	Considerations and Approach
Current Position:		Strategic Housing Market Assessment	Considerations:
Policy HO11 aims to ensure that there is a sufficient supply of good quality affordable housing distributed throughout the district particularly to the areas of highest need. It establishes the affordable housing targets for different parts of the district. It indicates that the Council will negotiate with applicants to provide the following proportions of affordable housing on-site subject to		(SHMA) and Local Housing Needs Survey The SHMA will provide information relating to the level of affordable housing need across the district. It will show the different types of affordable need in different parts of the district.	The Council will need to consider whether to retain the existing affordable housing targets or change them based on new housing need information and viability evidence. Approach:
viability: • Up to 30% in Wha	,	Local Plan Viability Assessment	In reviewing Policy HO11 the Council will look to:
·	ns, suburbs and villages	The Council will update its viability evidence to assess the proposed	Use the evidence from the SHMA
•	r Bradford and Keighley	requirements for affordable housing. This will help to show what levels of affordable	to identify the overall affordable housing need in the District an
·	pdate the affordable housing policy to ning policy since the adoption of the	housing can be supported on different types of sites in different areas of the District. A Place to Call Home	 the four sub-areas. Use the viability assessment to determine viable affordable housing targets for each sub-area. Use the evidence from the SHMA
out the contributions the levels and types indicates that such po	oh 34) indicates that plans should set expected from development including s of affordable housing. The NPPG olicy requirements should be informed affordable housing need and a ment of viability.	The update to the Housing and Homelessness Strategy (2014-2019) may provide refocused local directions on affordable housing priorities.	 and local housing strategies to determine what types of affordable tenure should be prioritised. Review the thresholds for requiring affordable housing on new developments.

Affordable housing requirements should be expressed as a single figure rather than a range, and that different requirements may be set for different types of sites or types of development. Subject to certain exemptions, the NPPF sets an expectation that at least 10% of homes on major development sites will be affordable.	
The definition of affordable housing has been revised in the new NPPF and now includes a broader range of affordable housing products, including starter homes and discounted market sales housing. It will be important to look at how this broader range of products can help to meet the affordable housing needs of Bradford's diverse population.	

Meeting Specialist Accommodation Needs

Table 9 Policy HO12: Sites for Travellers and Travelling Showpeople		
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
Current Position: Policy HO12 makes provision via policies and site allocations to deliver the following additional pitches for Gypsies and Travellers and plots for Travelling Showpeople for the period to 2030: • 39 pitches for the gypsy and traveller communities; • 7 pitches for transit accommodation • 45 pitches for travelling showpeople Key Issues: There is a need to update this policy to take into consideration: • The changing plan period (potentially to 2035); • Any changes to demographics and need requirements as established through the SHMA and Local Housing Needs assessment.	Strategic Housing Market Assessment (SHMA) and Local Housing Needs Survey The SHMA will include a focus upon specialist housing and accommodation and will review the existing evidence base on Gypsies and Travellers and Travelling Showpeople, detailed in the Gypsy and Traveller Accommodation Assessment (2015).	Considerations: Specialist accommodation forms an important component of the overall diverse housing and accommodation needs across the District. This information needs to be updated to align with the findings from the new SHMA and Local Housing Needs survey research. Approach: Review and establish updated pitch and plot needs for the Gypsy and Traveller community, Transit Provision and Showpeople, based upon updated research. Update policy as required.

Table 10	Policy EC1: Creating the Leeds City Region	g a successful and competitive Bradfo	ord District economy within
Current Position and Key Issues		Local Plan Evidence Updates	Considerations and Approach
Current Position:		Pioneering, Confident & Connected	Considerations:
competitive Bradfor	ne broad policy context for a rd District to support economic ular it looks to support:	The new Economic Strategy for the Bradford District 2018-2030 establishes a clear ambition for economic growth.	The Council will need to consider whether to retain the existing economic growth priorities or amend
the delivery of eand diversification	economic growth, restructuring on;	The need to take account of changing economic drivers and build a long term economic strategy is	them to incorporate the key priorities in the Economic Strategy for Bradford District and the national
the provision of Bradford City Ce	of Grade A office space in entre;	highlighted within the Government's <u>Industrial</u> <u>Strategy: 'Building a Britain fit for the future'</u> ,	Industrial Strategy; the initial outputs from the Local Inclusive Industrial
improving the li and skills developed	nks between job opportunities opment;	which establishes the long-term plan to boost the productivity and earning power of people throughout the UK.	Strategy for the Leeds City Region; and the potential economic growth opportunities through the
Modernising the	manufacturing industries	This ambition is further explored through the Local	implementation of Northern Powerhouse Rail.
A knowledge-dri	ven economy	Inclusive Industrial Strategy for the Leeds City	
A more entrepre	neurial District	Region, which is currently due for publication in 2019 by the Leeds City Region Local Enterprise	Approach:
	port links between the regional Bradford and Manchester).	Partnership (LEP) and West Yorkshire Combined Authority (WYCA). It will establish the key	In reviewing Policy EC1 the Council will look to:
-	non-business class sector as nd employment generators.	industrial sectors for economic growth over the medium and long term.	Identify the sectors which will be the drivers and focus for future
	or business relating to the environmental assets.	Strategic Economic Plan The latest version of the Strategic Economic Plan	economic growth in the District.Establish a set of new economic
ICT and commu	nications infrastructure.	(SEP) was published in September 2016. It builds	priorities.

Key Issues:

The NPPF requires planning policies to set out a clear economic vision and strategy which positively and proactively encourages economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.

The national and local economies are constantly changing and it will be important to identify the key drivers for change and ensure the policy approach is flexible to respond to any changes.

on progress to date and will drive action to deliver the economic vision and targets of the City Region. The SEP is currently in the process of being updated, and any changes made to the strategic approach to economic development will be analysed as part of this review.

Employment Needs Assessment and Land Review (ELR)

The Bradford Employment Land Review was first published in 2008, and then updated in 2011. The Review presented an economic overview of the Bradford District with an assessment of market and property trends and data. It evaluated future demand for employment land based on forecasting from the Regional Econometric Model (REM). This was used as a basis for determining future employment land need in the District.

The Review also undertook an appraisal of all sites in the current land supply against a range of criteria to assess their suitability for future employment use.

This evidence base is currently in the process of being updated, with early outputs due in Spring 2019. The updated review will give a broad indication of the future economic drivers in the district and provide guidance on the economic sectors that will be the focus for future economic growth.

Northern Powerhouse Rail

The potential business opportunities from

Northern Powerhouse Rail (NPR) could have a	I
significant impact on the Bradford economy.	
The Council's 'Northern Powerhouse Rail	
Bradford Growth Strategy' identifies a number	I
wider economic benefits of the NPR project,	I
including the creation of 14,250 net additional Full	I
Time Equivalent Jobs and £14.6bn in additional	I
Gross Value Added (GVA) by 2060. This equates	I
to a need for 670,000m ² of net additional floor	I
space over the next 40 years.	I

Space for Business and Jobs

Table 11 Policy EC2: Supporting Business and Job Creation		
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
Current Position: Policy EC2 supports the delivery of 1,600 new jobs in the District annually to 2030. This will be achieved through the allocation of at least 135ha of employment land over a range of sites in the Site Allocations DPD; implementing major regeneration initiatives; and supporting and improving the vitality and viability of the City Centre. Issues: The NPPF indicates that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Updated local economic priorities will also need to be more effectively reflected in the policy position.	Employment Needs Assessment and Land Review (ELR) The Employment Needs Assessment and Land Review will provide information on the current performance of the Bradford Economy and future economic forecasting to assist in establishing a potential future employment land requirement. The report will breakdown the employment requirement in the main B Use-classes (B1, B2 and B8), which will then influence the review of Policy EC2 and the number of sites allocated within the Site Allocations DPD. Pioneering, Confident & Connected The Council has recently endorsed the new Economic Strategy for the District which was prepared by the Bradford Economic Partnership. It sets out a plan to grow the local economy, which involves increasing the number of productive businesses and supporting young and enterprising people to innovate, invest and build fulfilling lives in the district.	The evidence to help set out specific options relating to the number of jobs that need to be provided is not yet fully available. The Council will need to consider the approach to determining the number of new jobs which should be provided annually. Approach: In reviewing Policy EC2 the Council will look to: Establish a jobs growth figure which has regard to the various economic strategies which are applicable to the District.

Our Employment Requirements

Table 12 Policy EC3: Employme	nt Land Requirement	
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
Current Position: Policy EC3 sets the employment land requirement for the District. It indicates that 135ha of land will be provided for employment use and that it should be distributed in the sub-areas as follows: City of Bradford: 100ha Airedale Corridor: 30ha Wharfedale Corridor: 5ha The distribution of the employment land requirement was based on past delivery rates. Key Issues: The NPPF stipulates that Local Plan policies should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. The new economic strategy sets out a series of key priorities and sectors, for which space for development and growth will be required.	Employment Needs Assessment and Land Review (ELR) The Employment Needs Assessment and Land Review will set out the detailed economic forecasting and the results of the supply and demand analysis. This will assist in establishing the current economic position in the District and identify the areas to which employers want to invest in the District. The supply side of the analysis will examine the desirability of existing and future employment sites across the District. The report will thus help to inform the strategic spatial distribution of employment land across the District and show how Policy EC3 may be changed to reflect the latest information. Pioneering, Confident & Connected The Economic Strategy sets out a plan to grow the local economy, which requires a mix and variety of business space.	Considerations: The Council will need to consider the approach to identifying the amount and distribution of the employment requirement. Approach: In reviewing Policy EC3 the Council will look to: Use the evidence from the Employment Needs Assessment and Land Review to identify a possible distribution of the employment requirement — including re-considering the defined sub-areas.

Our Shopping and Leisure Requirements

Table 13 Policy EC5: City, Town	, District and Local Centres	
Current Position and Key Issues	Local Plan Evidence Updates	Considerations and Approach
This policy sets out the approach to ensuring that the vitality and viability of the network and hierarchy of centres in maintained and that the appropriate level of retail and leisure developments are directed to the most suitable locations. It sets out specific requirements for retail needs for the different levels of the retail hierarchy. It also sets out floorspace thresholds for when an impact assessment will be required for edge or out of centre developments. Issues: The NPPF indicates that planning policies should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation. Accessible local shops can also play a positive role in providing the services that communities need and support healthy and safe communities. Planning policies should also support an appropriate mix of uses across an area, including shopping and leisure.	Retail and Leisure Study A new Retail and Leisure study is being prepared to provide up-to-date evidence on the current state of the retail and leisure economy in the Bradford District. It will look at the capacity for convenience and comparison retail and undertake a health check on the retail centres.	Considerations: The Council will need to consider whether there have been any strategic changes in the capacity and need for new retail development. In additional it will also need to review the centres in the retail hierarchy to determine whether any of the centres need reassigning. The study will also look at the floorspace thresholds for when an impact assessment is required. Approach: In reviewing Policy EC5 the Council will look to: Use the evidence from the Retail and Leisure study to establish the new capacity for convenience and comparison retailing in the District, broken down by centre where applicable. Use the evidence to assess the current floorspace thresholds for requiring an impact assessment.

Core Policies and Sub Area Policies			
Table 14 Policy SC7: Green Belt			
Current Position and Key Issu	S	Local Plan Evidence Updates	Considerations and Approach
Current Position: Policy SC7 sets out the valuab Belt plays in supporting urban transformation as well as kee separate and conserving the	e role the Green renaissance and bing settlements countryside. The ne exceptional nd to be released deliver the longer he District. efore concluding exist to justify ries, the Council ate that it has able options for evelopment. This esible of suitable land; opment including prificant uplift in town and city	There are a number of pieces of evidence that need to be updated which will influence whether the exceptional circumstances for releasing land from the Green Belt still exist. Strategic Housing Market Assessment (SHMA) and Local Housing Needs Survey The Council has recently commissioned consultants to produce an updated Strategic Housing Market Assessment (SHMA). A key aim and output of the study is to provide the evidence to inform any potential changes to the housing requirement in the Core Strategy. It will do this by assessing the latest demographic, social and economic data and relevant local strategic priorities and plans. The SHMA will also examine if there is a justification for any uplift to the Local Housing Need assessment figure and, if so, advise on the scale of this uplift. The information presented in the study will inform the housing requirement to be taken forward in the Core Strategy Partial Review. This will have a consequential impact upon the number of sites that are required to be allocated for housing to meet this figure.	Considerations: The updated evidence will be used to identify whether there continue to be exceptional circumstances for the release of Green Belt land and if so the extent of Green Belt changes that are required to facilitate growth. Policy SC7 will need to be amended to take account of this new evidence. Approach: In reviewing Policy SC7 the Council will look to: Review the housing and employment needs and requirements of the District. Review the extent of deliverable and developable land to meet needs, with a focus first upon brownfield and non-Green Belt locations.

c) discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

The Council will need to work through a series of steps before evaluating whether there are exceptional circumstances to justify changes to the Green Belt boundary. The extent of any Green Belt release is also linked to the consideration of any revised housing and employment requirements and a partial Green Belt assessment.

Employment Needs Assessment and Land Review

This review will provide information on the current performance of the Bradford Economy and future economic forecasting to assist in establishing a potential future employment land requirement. It will also assess the quality, suitability and marketability of the existing land supply which will be important for helping to determine if there is sufficient land to meet the employment needs of the District. The information presented within the study will be used in the SHMA to inform any potential economic uplift.

Strategic Housing Land Availability Assessments (SHLAA) and Site Assessments

Through an analysis of the SHLAA database and site assessments linked to the emerging Site Allocations DPD, the Council should be in a position to determine the extent and location of sustainably located Brownfield, Greenfield and Green Belt land which may be required to meet revised housing and employment needs.

Green Belt Selective Review

A selective review of Green Belt land around the sustainable growth locations identified in the Core Strategy will determine the extent to which Green Belt parcels are contributing towards the five purposes of the Green Belt as identified in the NPPF. This study will also identify any revised defensible Green Belt boundaries which will endure beyond the end of the plan period.

- neighbouring authorities regarding meeting housing and employment needs on non-Green Belt sites.
- Identify sustainable Green Belt site release options to meet our needs.

Table 15	Policy ID2: Viability			
Current Position and	l Key Issues	Local Plan Evidence Updates	Considerations and Approach	
Current Position		Local Plan Viability Assessment	Consideration	
planning policy requirements or planning obligations is sought due to financial viability, a viability assessment must be submitted to the Council. Part B of the policy indicates that where a development is economically unviable consideration will be given to individual scheme viability in the determination of planning applications.		Further work is required on updating viability evidence linked to policies and sites across the District and closely aligned to any review / updates to the adopted Community Infrastructure Levy with its associated evidence base. A working brief is being developed for this part of the evidence base to consider the implications of policy updates in the CSPR.	The process and approach to undertaking viability assessments for plan-making is set out in detail in the NPPG. Approach Any viability assessment should follow the government's	
emphasis upon viab	and NPPG place a strong ility being considered at the ather than through planning	implications of policy updates in the CSPR, viability review mechanisms and infrastructure requirements arising through the Site Allocations DPD.	assessing viability as set out in the	
policies have set out to development, planning them should be assume applicant to democircumstances justify assessment at the application should include setting affordable housing processing policies.	indicates that where up to date he contributions expected from g applications that comply with ned to be viable. It is up to the enstrate whether particular the need for a viability eplication stage. Contributions g out the levels and types of provision required, along with (such as that needed for transport, flood and water		Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.	

management, green and digital infrastructure).

Furthermore, the weight to be given to a viability assessment is a matter for the decision-maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publically available.

The updated NPPG also indicates that Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles.

- 2.4 There are also a number of other policies in the Core Strategy which may need to be amended as a consequence of the review of the strategic policies as set out above. This will mainly apply to the sub-area policies which, based on the content of polices such as HO3 and EC3, set out the scale and distribution of new housing and employment development in those areas.
- The following sub-area policies will need to be amended based on the outcomes from the evidence base and the options that are selected through the Partial Review. **Appendix 2** sets out in more detail those policies that may require consequential amendments due to changes in National Planning Policy:

• Policy BD1: The Regional City of Bradford including Shipley and Lower Baildon

Policy PN1: South Pennine Towns and Villages

• Policy AD1: Airedale

• Policy WD1: Wharfedale

3. Policy Additions and Minor Amendments

- 3.1 In addition to reviewing existing policies in the Core Strategy it will be important to consider whether there are any new issues which require a strategic policy response that could form part of the Partial Review. The revised evidence base will be used to help identify if there are any issues which need to be addressed through a new strategic policy. The following topics have been highlighted as possible new policy areas for further consideration:
 - Specialist housing
 - Self and Custom Build
 - Combined infrastructure priorities
 - Green Infrastructure further details
 - Healthy places
- 3.2 The changes to the National Planning Policy Framework may require some minor changes to be made to the reasoned justification of a number of other policies to make sure they remain up-to-date. **Appendix 2** sets out which policies will need minor or consequential amendments.

4. Timetable

- 4.1 The production of the Core Strategy Partial Review is expected to take around two years and involve a number of stages which are outlined below. There will be further opportunities to be involved and have your say on its content prior to it being submitted for examination by an independent planning inspector.
- 4.2 Table 4.1 sets out the broad timetable for the various stages which need to be carried out to progress the Core Strategy Partial Review to adoption. The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, provide the key regulations which must be followed in the preparation of a Local Plan. These regulations are referred to in the table below.
- 4.3 The Site Allocations DPD is being prepared at the same time as the Core Strategy partial review. This is to ensure that the Council puts in place an up-to-date Local Plan as soon as possible.

Table 4.1: Key Stages for the preparation of the Core Strategy Partial Review

Stage	Timeframe	Comment
Scoping Consultation (Regulation 18)	January – February 2019	This consultation considers the scope of the Core Strategy partial review and identifies the key issues and considerations.
Preferred Option (Regulation 18)	May – June 2019	This consultation will present the Council's preferred policy approach. This should be an appropriate strategy which addresses the issues highlighted in the previous consultation. It will also set out the reasonable alternatives that have been discounted.
Publication Draft (Regulation 19)	January – February 2020	This consultation will present the Council's final draft version of the revised Core Strategy before it is submitted to the Secretary of State for examination. It will provide the community and key stakeholders a final chance to comment on the content of the plan in terms of its soundness.
Submission (Regulation 22)	July 2020	This stage requires the Council to submit the Core Strategy and all supporting documents to the Secretary of State via the Planning Inspectorate (PINS) for Examination.
Examination (Regulation 24)	October 2020	The Government (through PINS) appoints a Planning Inspector to carry out an Examination of the plan. The Examination will test the soundness of the plan and ensure that is has complied with the Duty to Cooperate and other relevant legislation.
Adoption (Regulation 26)	December 2021	If the plan is found sound at Examination then the Council can progress to adoption. Once adopted the Core Strategy Partial Review will become part of the Development Plan and replace those policies in the Core Strategy.

5. Sustainability Appraisal and other impact assessments

- 5.1 The Core Strategy Partial Review will be subject to a Sustainability Appraisal (SA) to consider the impacts of the revised policies on the social, economic and environmental sustainability objectives.
- 5.2 A scoping report has been prepared which sits alongside this consultation document. It establishes the SA framework which will be used to assess the policies in the Core Strategy Partial Review. It also reviews the baseline information and data to establish the current conditions. This will be used to allow the effects of the revised Core Strategy policies to be monitored.
- 5.3 There are a number of other impact assessments that will need to be carried out to ensure that the Core Strategy Partial Review does not have any negative or adverse impacts on the community or environment. These assessments include:
 - Habitats Regulation Assessment (HRA)
 - Equalities Impact Assessment (EqIA)
 - Health Impact Assessment (HIA)
- 5.4 Scoping reports for these assessments have also been prepared to establish how the impacts of the Core Strategy policies will be identified and mitigated where necessary.

6. Duty to Cooperate

- 6.1 Under the Localism Act 2011 the Council has a Duty to Cooperate with its neighbouring local authorities and other prescribed bodies on strategic matters that cross administrative boundaries. As part of the Partial Review process it will be important to identify the strategic cross boundary issues at an early stage and engage with the relevant authorities.
- 6.2 The new NPPF introduces the requirement for councils to prepare statements of common ground to show how the cross boundary issues are being addressed. This Scoping Report provides the first opportunity to identify and discuss any potential cross boundary issues that may occur as part of the review process.

7. Commenting on this Report

- 7.1 The Core Strategy Partial Review is available for comment from Friday 11 January 2019 until 5pm on Friday 22 February 2019.
- 7.2 If you wish to make a representation to the consultation please visit: www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/ to complete the online survey or download documents, including the comments form. The details of supporting public information events are also available on the Council's website.
- 7.3 Comments can be made on any aspect of this report and supporting documents. However, the Council is particularly interested in whether the range of policies identified for review is appropriate. To assist in the swift and cost efficient processing of representations we are encouraging the use and completion of the online survey.

8. Next Steps

- 8.1 Following the close of the consultation the responses received will be analysed and where appropriate will be used to help inform the policy approach together with the revised evidence-base and guidance in the NPPF and NPPG.
- 8.2 A consultation statement will be prepared to provide a summary of the responses received and show how they have been taken into account. This statement will be made available at the next consultation stage (Preferred Option).
- 8.3 The Council will use the evidence base that it is preparing to help determine an appropriate policy response to the issues raised in this document. It will consider a range of options and develop an appropriate strategy from one of these options.

9. Appendix 1 – Evidence base

- A1.1 The NPPF (paragraph 31) indicates that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. It is therefore important that an up-to-date evidence base is put in place to support the partial review of the Core Strategy. New evidence will need to be gathered and a review of some existing evidence will also need to be carried out.
- A1.2 Table A1.9 below sets out the key elements of the evidence base, which are being updated.

Table A1.9– Evidence Base

Document	Comment
Strategic Housing Market Assessment (SHMA) and Local Housing Need Study	The first SHMA for the District was prepared in 2010 and was subsequently reviewed in 2013. There have been a number of changes to the planning system, legislation and the wider housing market and economy since the last update along with the release of new population and household projections, and the release of the standard methodology for calculating minimum local housing need. It is therefore necessary to prepare an updated SHMA to take account of the latest available information. The Council has commissioned consultants arc4 Ltd to prepare a new SHMA and Local Housing Need Study. The housing work will also include a review of specialist housing and accommodation needs.
Strategic Housing Land Availability Assessment (SHLAA)	The SHLAA is currently being updated to provide the latest information regarding the amount of land that is potentially available for new housing development. Part of the update involves combined housing and employment land information and a movement towards producing a Strategic Housing and Employment Land Availability Assessment (SHELAA).
Employment Needs Assessment and Land Review	The Council is in the process of commissioning consultants to prepare a new Employment Needs Assessment and Land Review. The study will look at the current and past economic trends and forecasting for the Bradford District. It will identify and assess the current employment land portfolio and establish possible economic growth scenarios and the employment land requirement.
Retail and Leisure Study	The Council is in the process of commissioning consultants to prepare a new Retail and Leisure study. This will look at the capacity for new retail development in the different

Document	Comment
	centres around the District and will carry out health checks on the main centres looking at their vitality and viability.
Green Belt Selective Review	The study will make an assessment of the Green Belt in the Bradford District. It will look at broad parcels of land and assess how strongly they perform against the five purposes of including land within the Green Belt as set out in the NPPF. The study involves a selective review of Green Belt parcels associated with locations identified for growth within the settlement hierarchy.
Strategic Flood Risk Assessment (SFRA)	The Council has commissioned consultants JBA Consulting to prepare an updated Level 1 SFRA for the District to support the Site Allocations plan. This will identify areas at risk from flooding, existing measure to manage flood risk and identify areas at risk from surface water flooding.
Open Space Assessment	The Bradford Open Space, Sport and Recreation Study was prepared in 2006 and now needs to be updated. The Council has commissioned consultants Knight, Kavanagh & Page to produce a new Playing Pitch Strategy. This will replace the outdoor sports facilities assessment from the 2006 study. The Council are in the process of scoping the open space assessment which will provide an audit of the existing open spaces within the District. It will also assess the quantitative and qualitative needs for open space, identifying surpluses and deficiencies of spaces in each area of the District.
Playing Pitch Strategy (PPS)	The Council has commissioned Knight, Kavanagh & Page to prepare a Playing Pitch Strategy for the District. This strategy provides a strategic framework to ensure that the provision of outdoor playing pitches meet local and community needs of existing and future residents and visitors to the area. The PPS will provide the evidence required to help protect playing fields to ensure sufficient land is available to meet existing and projected future pitch requirements.
Landscape Character Assessment	The Council has a comprehensive adopted Landscape Character Assessment SPD, which was published in 2008. An initial review has indicated that there may be areas of the District and aspects of the assessment which may require review. There are also cross-overs with landscape assessment and the site assessment work for the Allocations DPD.

Document	Comment
Other environmental evidence	Policy SC8 sets out the approach to the protection of the North and South Pennine Moors SPA and SAC. Visitor surveys and bird surveys were commissioned to provide baseline data and evidence relating to the use of these areas. This information has been used to formulate the policy regarding the potential impacts of development on these areas. These surveys now need to be updated to continue to support the implementation of the policy and help assess the emerging spatial development options as part of the CSPR. The Council are also in the process of preparing a Supplementary Planning Document (SPD) which will set out the mechanism for calculating the financial contributions that should be made by developers to mitigate the impacts on the SPA and SAC due to the increase in population. The new survey data will also be used in the preparation of the SPD.
Local Infrastructure	The updated Local Infrastructure Plan (LIP) will provide a reassessment of local infrastructure needs linked to the site allocations process. It will include updates relating to the requirements of education, health, utilities, community infrastructure and transport.
Transport Modelling	The Council has commissioned a new multi-modal transport model for the District. Work will be required particularly around understanding the impact of site allocations within the model and potential mitigation measures. The final overall quantum, locations and scale of housing and employment growth, together with any mitigation measures, will need to be evaluated through the model.
Local Plan Viability Assessment	The Council intend to commission a new Local Plan Viability Assessment in 2019 to test any new policy requirements in the Core Strategy review, site infrastructure considerations and inform site allocations.

10. Appendix 2 – Policy Review

A2.1 Table A2.1 provides a list of the policies in the Core Strategy and identifies whether they will be included in the Partial Review.

Table A2.1 – Core Strategy Policies

Policy		Major Review	Comment	Strategic Policy?
Presur	mption in Favour of Sustainable	Developme	ent	
P1	Presumption in Favour of Sustainable Development	*	This is the standard policy which sets out the Council's approach to the presumption in favour of sustainable development in line with the National Planning Policy Framework.	✓
			There have been no substantial changes to the presumption in favour of sustainable in the NPPF which require Policy P1 to be revised.	
Strate	gic Core Policies			
SC1	Overall Approach and Key Spatial Priorities	×	This policy sets out the strategic approach to managing development in the District over the plan period. It provides the strategic priorities for the area. There may be some consequential amendments to this policy depending on the outcomes of the evidence base.	✓
SC2	Climate Change and Resource Use	×	This policy sets out the approach to managing, adapting to, and mitigating the impacts of climate change. These principles are still relevant and in conformity with the NPPF, therefore this policy does not need reviewing at this time.	~
SC3	Working together to make Great Places	×	This policy requires effective collaboration between the Council and other organisations to deliver the plan. It sets out a list of key priorities which should be supported by joint working. It identifies the importance of this approach for the Duty to Co-operate. These principles are still relevant and there is no need to review the policy at this time. The NPPF introduces the requirement to	*

Policy	Policy		Comment	Strategic Policy?
			prepare a Statement of Common Ground which should show how cross boundary issues have been addressed. This policy would support this process.	
SC4	Hierarchy of Settlements	×	This policy sets out the different roles of the towns and villages in the District. It identifies four levels of settlement: Regional City; Principal Towns; Local Growth Centres; and Local Service Centres and Rural Areas. It is not envisaged that there will be any substantial changes to the settlement hierarchy although this will be evaluated in light of the revised levels of growth planned for the District.	✓
SC5	Location of Development	*	This policy provides the approach to the location of development. It indicates that the first priority should be the re-use of deliverable and developable previously developed land and buildings followed by Greenfield opportunities within settlements; then Local Green Belt releases; then larger urban extensions. This policy may need to be updated should the scale of growth be shown to be substantially lower than in the adopted Core Strategy. The locational priorities may be revised if Green Belt land is no longer required to meet future development needs. Consideration needs to be given as to whether the third and fourth priorities need to be differentiated.	✓
SC6	Green Infrastructure	×	This policy looks to support and encourage the maintenance, enhancement and extension of networks of multi-functional spaces, routes and key areas of Green Infrastructure. It provides a definition of Green Infrastructure for the District and looks to protect those assets which meet the definition. There have been no specific changes in the NPPF relating to the provision of Green Infrastructure and therefore Policy SC6 is unlikely to need a major review at this time. Further detailed work may be required on the delivery of Green Infrastructure linked to final site allocations and possibly a light refresh on policy content.	✓

Policy	Policy		Comment	Strategic Policy?
SC7	Green Belt	✓	This policy sets out the exceptional circumstances for the release of Green Belt land. It identifies the need to carry out a selective review of Green Belt boundaries in locations that would not undermine the strategic function of the Green Belt. The NPPF has clarified and amended the tests for justifying the existence of exceptional circumstances. Together with the potential changes to growth levels within the District the exceptional circumstances will need to be reexamined and Policy SC7 will need to be amended.	✓
SC8	Protecting the South Pennine Moors and their Zone of Influence	*	This policy sets out the strategic approach to protecting the South Pennine Moors SPA and SAC. The Council is committed to preparing a SPD which will establish a mitigation strategy and set out a mechanism for the calculation of the financial contributions that should be made. Initial work on the SPD has now started, however, there is a need to commission new survey work to update the current position relating to the use of these areas. There has been no policy change or change in circumstances which would require a review of this policy.	✓
SC9	Making Great Places	×	This policy sets out some general principles which should be used in plans and development proposals to contribute to creating high quality places. There has been no policy change or change in circumstances which would require a review to this policy.	✓
Sub Ai	rea Policies			
BD1	The Regional City of Bradford including Shipley and Lower Baildon	✓	This policy sets out the approach to managing growth and development in the Regional City of Bradford (including Shipley and Lower Baildon). It provides details of the amount of new housing development to be accommodated in the area (taken from Policy HO3). This policy will require consequential amendments based on the changes made to other strategic policies in the Plan. However, the overall approach to managing growth in this area will be maintained.	×

Policy	Policy		Comment	Strategic Policy?
BD2	Investment priorities for the City of Bradford including Shipley and Lower Baildon	×	This policy sets out the investment priorities for the Regional City of Bradford (including Shipley and Lower Baildon). There may need to be some consequential amendments to this policy if the investment priorities have changed.	×
AD1	Airedale	✓	This policy sets out the approach to managing growth and development in Airedale. It provides details of the amount of new housing development to be accommodated in the area (taken from Policy HO3). This policy will require consequential amendments based on the changes made to other strategic policies in the Plan. However, the overall approach to managing growth in this area will be maintained.	×
AD2	Investment priorities for Airedale	×	This policy sets out the investment priorities for Airedale. There may need to be some consequential amendments to this policy if the investment priorities have changed.	×
WD1	Wharfedale	✓	This policy sets out the approach to managing growth and development in Wharfedale. It provides details of the amount of new housing development to be accommodated in the area (taken from Policy HO3). This policy will require consequential amendments based on the changes made to other strategic policies in the Plan. However, the overall approach to managing growth in this area will be maintained.	×
WD2	Investment priorities for Wharfedale	×	This policy sets out the investment priorities for the Wharfedale. There may need to be some consequential amendments to this policy if the investment priorities have changed.	×
PN1	South Pennine Towns and Villages	✓	This policy sets out the approach to managing growth and development in the South Pennine Towns and Villages. It provides details of the amount of new housing development to be accommodated in the area (taken from Policy HO3). This policy will require consequential amendments based on the changes made to other strategic policies in the Plan. However, the overall approach to	×

Policy		Major Review	Comment	Strategic Policy?		
			managing growth in this area will be maintained.			
PN2	Investment priorities for the Pennine Towns and Villages Sub Area	*	This policy sets out the investment priorities for the South Pennine Towns and Villages. There may need to be some consequential amendments to this policy if the investment priorities have changed.	*		
Thema	Thematic Policies – Planning for Prosperity					
Econo	my					
EC1	Creating a successful and competitive Bradford District economy within the Leeds City Region	✓	This policy sets out a series of priorities which plans and proposals should seek to deliver in order to achieve a successful and competitive Bradford District. The recent publication of the new Economic Strategy for Bradford, work on the Local Inclusive Industrial Strategy for the Leeds City Region and the potential opportunities from Northern Powerhouse Rail are likely to influence the economic direction of the District. As such it is important to review Policy EC1 to update and amend, where necessary, the economic priorities.	✓		
EC2	Supporting Business and Job Creation	✓	This policy establishes the job growth and employment land targets for the District. New evidence in the Employment Needs Assessment and Land Review may show a change to the jobs growth figure and this will require a review of the policy.	✓		
EC3	Employment Land Requirement	✓	This policy sets out the amount of employment land required in the District and its broad distribution. Changes in the evidence relating to the amount of available employment land may require a review of the distribution of the employment requirement.	√		
EC4	Sustainable Economic Growth	×	This policy indicates how the Council will ensure that economic development in the District is managed in a sustainable way.	✓		
EC5	City, Town, District and Local Centres	✓	This policy sets out the approach to the provision of new retail and leisure developments in each of the District's centres. It establishes the hierarchy of	✓		

Policy		Major Review	Comment	Strategic Policy?	
			centres and floorspace thresholds for when impact assessments are required. Changes to the NPPF and evidence base updates may require some changes to the policy.		
Transp	port				
TR1					
TR2	Parking Policy	×	This policy looks to manage the provision of car parking to help manage travel demand. In particular it sets out indicative parking standards for new development. The NPPF has changed its approach to parking standards and there may need to be minor changes to Policy TR2 as a result.	×	
TR3	Public Transport, Cycling and Walking	*	This policy looks to safeguard and improve public transport, walking and cycling infrastructure and services. It indicates that the accessibility standards and transport networks should be used to guide the allocation of new development sites in the Allocations DPD. It also sets out mechanism s which should be considered to help improve public transport throughout the District. The revised NPPF still requires opportunities to promote walking, cycling and public transport to be identified and pursued. There may need to be some minor changes to the policy to reflect any updates to the local transport strategies.	✓	
TR4	Transport and Tourism	×	This policy aims to support sustainable access to tourist destinations, heritage and cultural assets and leisure uses.	×	

Policy	Policy		Comment	Strategic Policy?
			There have been no substantial changes to national planning policy or local circumstances which require Policy TR4 to be updated.	
TR5	Improving Connectivity and Accessibility	*	This policy supports the protection and enhancement of the District's highway, rail and bus networks. It also supports improvements to transport provision in the more isolated and poorly serviced parts of the District. It looks to do this through a variety of measures including the development of sustainable transport solutions and influencing the delivery of services. There have been no substantial changes to national planning policy which would require Policy TR5 to be updated.	✓
TR6	Freight	*	This policy looks to encourage the development of an integrated freight distribution system. It sets out a range of criteria that development decisions should take into account. These include maximising the use of rail for freight movements; encouraging storage/distribution developments to be located near intermodal freight facilities; encourage the protection of rail connected land for future uses. There have been no substantial changes to national policy which require TR7 to be updated. However, minor changes may need to be made to take account of any new or amended transport plans or strategies.	×
TR7	Transport Investment and Management Priorities	×	This policy supports those transport investment priorities which are outlined in the Leeds City Region Transport Strategy and Local Transport Plan; Regional Growth Fund; and West Yorkshire+ Transport Fund. It sets out the order in which the priorities should be pursued. This policy will only need to be updated to take account of any changes to the relevant transport plans and strategies.	✓
TR8	Aircraft Safety	*	This policy aims to protect aircraft safety and does not permit any development proposals that will create a hazard to the safe operation of aircraft, aerodromes or aircraft navigation facilities. There have been no substantial changes to national planning policy which will require this policy to be updated.	×

Policy		Major Review	Comment	Strategic Policy?
Thema	tic Policies – Planning for Peop	ole		
Housin	g			
HO1	Scale of Housing Required	✓	This policy establishes the housing requirement for the District, setting an overall target of 42,100 homes to be delivered by 2030. The new NPPF has introduced a Standard Methodology for calculating minimum housing need. The initial indication from this calculation suggests that the amount of housing needed in the District may be significantly lower than the housing requirement set out in the Core Strategy. The Council has commissioned consultants to prepare a new Strategic Housing Market Assessment (SHMA) to look at the housing needs of the District and to consider whether there are any factors which may result in any uplift to the amount of housing that is required. On this basis it is necessary to review Policy HO1 and set a new housing requirement figure as appropriate.	✓
HO2	Strategic Sources of Supply	*	This policy looks at the different sources of housing land which will be used to meet the housing requirement. The policy currently contains reference to the need to make changes to the Green Belt and identifies certain growth locations. These strategic policy elements could change depending on the outcomes of the evidence base and changes to policies elsewhere.	✓
НО3	Distribution of Housing Requirement	√	This policy sets out how the housing requirement will be distributed across the District. It may be necessary to alter this distribution should the findings of the SHMA suggest a different level of housing need. The update of the SHLAA may also influence the distribution of the housing requirement. As a consequence this policy should be reviewed.	✓
HO4	Phasing and Release of Housing Sites	✓	This policy sets out the approach to the phased release of housing sites. This policy makes reference to the plan period which may need to be updated depending on the outcome of the review. Specific consideration will need to be	✓

Policy		Major Review	Comment	Strategic Policy?
			given to the scale of housing growth and the likely delivery over the plan period taking account of market performance. This may require an alternative phasing approach to be established and require the review of Policy HO4.	
HO5	Density of Housing Schemes	*	This policy requires new housing to make the best and most efficient use of land – delivering the most houses possible while taking account of the need to arrive at a well-designed layout. It sets a minimum density of 30 dwellings per hectare but acknowledges some areas can provide higher densities. The revised NPPF provides additional detail on ensuring the efficient use of land, including requiring plans to set out density standards for different areas. It may be necessary to review this policy and look at introducing higher densities around transport hubs. This is likely to be part of a series of measures that will need to be investigated when determining whether exceptional circumstances for the release of Green Belt land exit and further work is undertaken on site allocation options and testing density levels with requirements for healthy well designed places.	✓
HO6	Maximising the use of Previously Developed Land	✓	This policy prioritises the use of previously developed land (PDL). It sets targets for the proportion of completions which should be on PDL based on both the proposed housing distribution and the evidence relating to land supply and deliverability. The PDL land targets may therefore need to be adjusted to reflect any changes in the housing requirement and distribution; and evidence from the SHLAA.	✓
HO7	Housing Site Allocation Principles	*	This policy provides details of the principles which will be used to assess potential housing site allocations. These draw on key policies from the Core Strategy and National Planning Policy requirements. There may be some minor consequential amendments to this policy based on changes to the NPPF. The Site Allocations DPD site assessment methodology establishes the specific criteria which will be used to assess potential allocations.	✓
НО8	Housing Mix	✓	This policy looks to support the provision of a mix of housing to meet the needs	✓

Policy		Major Review	Comment	Strategic Policy?
			of the District's population. It sets out a number of strategic priorities for the types and sizes of housing that are needed. New evidence from the SHMA will be used to identify any changes to the housing mix that is required in the District and Policy HO8 will be amended accordingly.	
HO9	Housing Quality	✓	This policy looks to ensure that new housing is developed in a sustainable way. New evidence will be used to identify the range of standards new housing that could be achieved. The policy will be reviewed to incorporate the relevant standards.	√
HO10	Overcrowding and Vacant Homes	×	This policy looks to make the best use of the existing housing stock and address issues relating to overcrowding and empty homes. There have been no substantial changes to national planning policy which will require the revision of this policy.	×
HO11	Affordable Housing	✓	The policy sets out the approach to the provision of affordable housing. It establishes targets for affordable housing in the different sub-areas of the District. Changes in the NPPF relating to the definition of affordable housing and new evidence from the SHMA relating to the amount of affordable housing required will mean that Policy HO11 will need to be reviewed.	✓
HO12	Provision of Sites for Gypsies, Travellers and Travelling Showpeople	✓	This policy sets out the requirement for sites/pitches for the Gypsy, Traveller and Travelling Showpeople community. Evidence from the new SHMA may be used to amend the policy where necessary.	✓
Thema	atic Policies – Planning for Place	е		
Enviro	nment			
EN1	Open Space, Sports and Recreational	×	This policy looks to protect land identified as recreation open space from development. It identifies a number of exceptions where development will be permitted provided that it meets the relevant criteria.	✓

Policy		Major Review	Comment	Strategic Policy?
			It also sets out the requirement for new housing developments to provide new or improved open space. Developments which contribute to recreational pressures on the South Pennine Moors SPA and SAC will need to provide new recreational natural greenspace or improvements to existing open spaces.	
			The policy also sets out the approach to the provision of Local Green Space.	
			There have been no substantial changes to national planning policy in relation to open space. A new evidence base is being prepared to audit and assess open spaces in the District. However, it is unlikely this will require a review to the policy.	
EN2	Biodiversity and Geodiversity	×	This policy sets out the approach to the protection of Biodiversity and Geodiversity assets in the District. In particular it sets out the criteria for considering development proposals which may affect the different types of designation. The revised NPPF now places a greater emphasis on plans to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection of priority species. It now also requires plans to identify and pursue opportunities for securing measurable net gains for biodiversity. This may require some minor changes to be made to the policy.	✓
EN3	Historic Environment	×	This policy looks to preserve, protect and enhance the character, appearance, archaeological and historic value and significance of the District's designated and undesignated heritage assets and their settings. There have been no substantial changes to national planning policy which would require a change to Policy EN3.	✓
EN4	Landscape	*	This policy requires developments to make a positive contribution to the conservation, management and enhancement of landscapes in the District. It sets out the criteria to assess whether a change to the landscape is acceptable. There has been substantial change to national planning policy which would require Policy EN4 to be amended.	✓

Policy		Major Review	Comment	Strategic Policy?
EN5	Tree and Woodlands	×	This policy seeks to preserve and enhance the contribution trees and woodland make to the character of the District. The revised NPPF now places greater emphasis on the protection of veteran trees and ancient woodland. However, this will only result in a minor change to Policy EN5.	*
EN6	Energy	*	This policy supports improvements to energy efficiency and the development of renewable and low carbon sources of energy. The revised NPPF incorporates the 2015 Written Ministerial Statement which indicates that wind energy development should not be considered acceptable unless it is in an area identified for wind energy and following consultation the planning impacts have been fully addressed and the proposal has the local community's backing. This may require some minor changes to the Policy.	✓
EN7	Flood Risk	*	Policy EN7 sets out the approach to managing flood risk in new development. The revised NPPF includes some new requirements including considering the cumulative impacts in, or affecting, local areas susceptible to flooding. There may need to be some minor changes to Policy EN7 to reflect these additional requirements.	✓
EN8	Environmental Protection Policy	*	This policy sets out the approach to dealing with pollution issues specifically relating to Air Quality; Land; Nuisance; and Water Environment. It requires proposals that are likely to cause pollution to minimise that pollution to a level that provides a high standard of protection for health, environmental quality and amenity. The revised NPPF puts additional emphasis on developments helping to improve local environmental conditions such as air and water quality. However, it is considered that Policy EN8 already takes a positive approach to ensure improvements in air quality are made.	✓

Policy		Major Review	Comment	Strategic Policy?
Minera	ls			
EN9	New Minerals Extraction Sites	×	This policy sets out the criteria to be used to assess sites for new and extended mineral extraction sites. There have been no substantial changes to national policy which would require a review of this policy.	✓
EN10	Sandstone Supply	×	This policy sets out the approach for determining proposals for the extraction of sandstone. There have been no substantial changes to national policy which would require a review of this policy.	✓
EN11	Sand, Gravel, Fireclay Coal and Hydrocarbons (oil and gas)	×	This policy set out the approach to considering proposals for the extraction of sand, gravel, clay and coal. It also looks at the exploration and commercial production of hydrocarbons. There have been no substantial changes to national policy which would require a review of this policy.	✓
EN12	Minerals Safeguarding	×	This policy sets out the approach to safeguarding mineral resources from sterilisation. It sets out the criteria that proposals must meet to allow development to progress. There have been no substantial changes to national policy which would require a review of this policy.	✓
Waste	Management			
WM1	Waste Management	×	This policy sets out how the Council will effectively manage waste in the district. There have been no substantial changes to national policy which would require a review of this policy.	✓
WM2	Waste Management	×	This policy sets out the approach for identifying sites the management of waste. There have been no substantial changes to national policy which would require a review of this policy.	✓

Policy	,	Major Review	Comment	Strategic Policy?
Design	າ			
DS1	Achieving Good Design	*	This policy requires development proposals to contribute to achieving good design and high quality places. It sets out a range of criteria that should be used to assess the design quality of the proposal. Although the revised NPPF has strengthen national policy with regards to ensuring that planning achieves good design, the changes are not so substantial that they will require changes to be made to Policy DS1.	✓
DS2	Working with the Landscape	×	This policy requires development proposals to take advantage of existing features, integrate development into the wider landscape and create new quality spaces. There have been no substantial changes to national policy which would require a review of this policy.	✓
DS3	Urban Character	×	This policy requires development proposals to create a strong sense of place and be appropriate to their context in terms of layout, scale, density, details and materials. There have been no substantial changes to national policy which would require a review of this policy.	✓
DS4	Streets and Movement	*	Policy DS4 aims to ensure that the design and layout of streets and paths should make it as easy and attractive to walk and cycle or use public transport as it is to travel by car. It looks to ensure that new developments create a network of routes which connect to where people want to go. There have been no substantial changes to national policy which would require a review of this policy.	✓
DS5	Safe and Inclusive Places	*	Policy DS5 seeks to ensure that new developments reduce the opportunities for crime and anti-social behaviour and that buildings and places are accessible to all. There have been no substantial changes to national policy which would require a review of this policy.	✓

Polic	y	Major Review	Comment	Strategic Policy?
Imple	mentation and Delivery Policies			
ID1	Development Plan Documents and Annual Monitoring Report	*	This policy sets out the other Development Plan Documents (DPD) which will make up the Local Plan. It also commits the Council to prepare an Annual Monitoring Report (AMR) to report on the implementation of the Local Development Scheme and the effectiveness on the policies in the Local Plan. Minor amendments will be made to this policy where appropriate.	*
ID2	Viability	✓	This policy indicates that where an application seeks to vary a planning policy requirement or a planning obligation, then the applicant should submit a viability assessment to justify the variation. It also indicates that where a scheme is economically unviable consideration will be given to its viability when determining the planning application. The NPPF has made some changes in respect of when viability assessments should be requested. Policy ID2 will need to be updated to reflect these changes.	✓
ID3	Developer Contributions	×	This policy sets out the Council's approach to collecting developer contributions. Development proposals are expected to contribute towards the cost of providing infrastructure as well as social and environmental requirements which are directly related to the proposed development in scale and kind. The policy sets out the criteria for negotiating the level of contribution that will be sought. Changes to the NPPF and the regulations relating to S106 and CIL mean that this policy may need some amendments.	✓
ID4	Working with Partners	×	This policy sets out how the Council will work with its partners to ensure the delivery of infrastructure to support new development. The revised NPPF introduces a requirement to prepare of Statements of Common Ground as part of the Duty to Cooperate process. This will formalise arrangements with partners relating to strategic cross boundary issues. However, there have been no substantial changes to national policy which would require this policy to be reviewed.	✓

Policy	,	Major Review	Comment	Strategic Policy?
ID5	Facilitating Delivery	×	This policy sets out the ways in which the Council will help aid the sustainable growth of the District and the delivery of the plan. There have been no substantial changes which require the revision of this policy.	✓
ID6	Simplification of Planning Guidance to Encourage Sustainable Development	×	This policy sets out a range of tools to simplify planning guidance and facilitate efficient and effective delivery of sustainable development. There have been no substantial changes which require the revision of this policy.	✓
ID7	Community Involvement	×	This policy provides the Council's commitment to community involvement for the preparation of Local Development Documents and in the determination of planning applications. There have been no substantial changes which require the revision of this policy.	✓
ID8	Regeneration Funding and Delivery	×	The list of initiatives and funding possibilities will need to be updated and reviewed.	×
Appen	dices			
1	Glossary of Terms and Acronyms	×	This appendix provides the definition of key planning terms and will be updated as appropriate taking account of changes to national planning policy and guidance.	N/A
2a	Policy Linkages	×	This appendix provides details of the links between the policy themes in the National Planning Policy Framework; the Core Strategy objectives and policies; the Sustainability Appraisal Objectives; and RSS Policy/LEP Plan/ Interim Strategy Statement. The changes to the NPPF and other strategies will mean that this Appendix will have to be updated.	N/A
2b	Leeds City Region Strategies	*	This appendix sets out those Leeds City Region strategies which are relevant to the Core Strategy. This appendix will need to be updated to reflect the new strategies that have been prepared for the Leeds City Region.	N/A

Polic	у	Major Review	Comment	Strategic Policy?
3	Accessibility Standards	×	This appendix sets out the accessibility standards that should be used to assess applications for the development of new housing, employment and social infrastructure in conjunction with Policies TR1, TR3, TR4 & TR5. There have not been any substantial changes which would require this appendix to be reviewed.	N/A
4	Car Parking Standards	×	This appendix sets out the car parking standards for different types of development. There have not been any substantial changes which would require this appendix to be reviewed.	N/A
5	Leeds Bradford Airport Aerodrome Safeguarding Map	×	This appendix provides the map of the Leeds Bradford Airport Aerodrome Safeguarding area to be used in conjunction with Policy TR8. There have not been any substantial changes which would require this appendix to be reviewed.	N/A
6	Housing Implementation and Delivery Strategy	✓	This appendix sets out the Housing Delivery and Implementation Strategy. It includes the housing trajectory which shows past housing completions and future projected completions, which helps to show how and when the housing requirement will be met. Changes to the housing requirement and up-to-date evidence on completions will require the housing trajectory to be updated.	N/A
7	Waste Management Areas of Search	×	This appendix provides the map showing the waste management areas of search to be used in conjunction with Policy WM2. There have not been any substantial changes which would require this appendix to be reviewed.	N/A
8	Sustainability Appraisal Objectives	×	This appendix sets out the objectives used in the Sustainability Appraisal. It will be updated where necessary to reflect changes made to the Sustainability Appraisal.	N/A
9	Open Space Standards	×	This appendix sets out the accessibility standards for the provision of open space for different typologies. The Open Space Assessment is one of the evidence base documents that is being reviewed. This may suggest that the standards set out in the appendix need to be amended.	

Policy		Major Review	Comment	Strategic Policy?
10	Spatial Vision and Strategic Objectives – Expected Outcomes	×	This appendix shows which indicators will be used to monitor the strategic objectives of the plan. There may need to be some minor amendments to the indicators depending on the outcome of the policy review.	N/A
11	Species of International, National and Local Importance	*	This appendix provides details of legislation and policies which identify species of international, national and local importance. It also identifies those habitats which are of particular importance in the district. This appendix will only be updated to reflect any changes in legislation.	N/A
12	Habitat Creation Targets	*	This appendix sets out the habitat creation and restoration targets for 2020 for different habitat types. This appendix will only be reviewed where the targets have changed.	N/A
13	Minerals Safeguarding Targets	×	This appendix provides the map showing the minerals safeguarding areas to be used in conjunction with Policy EN12. There have not been any substantial changes which would require this appendix to be reviewed.	N/A
14	South Pennine Moor Zones of Influence	×	This appendix presents the map showing the South Pennine Moors Zones of Influence to be used in conjunction with Policy SC8. This map may be updated depending on the outcomes of the Habitats Regulations Assessment and any updated survey work commissioned by the Council.	N/A

11. Appendix 3 - References

A3.1 The following documents have been used in the preparation of this Scoping Report.

National Policy and Guidance

National Planning Policy Framework, MHCLG, 2018

National Planning Practice Guidance, MHCLG, 2018

City Region and Local Policy and Guidance

<u>Leeds City Region Strategic Economic Plan 2016-2036, Leeds City Region Enterprise</u>

<u>Partnership and West Yorkshire Combined Authority, 2016</u>

<u>Local Plan for the Bradford District: Bradford Core Strategy Development Plan Document,</u> CBMDC, 2017

<u>Pioneering, Confident & Connected – An Economic Strategy for Bradford District 2018-2030,</u> The Bradford Economic Partnership, 2018

Northern Powerhouse Rail Bradford Growth Strategy

12. Appendix 4 – Glossary

Term	Definition
Affordable Housing	This is housing for sale or rent for people whose needs are not by the market (including housing that provides a subsidised route to home ownership and / or is for essential local workers) and which complies with one or more of the following:
	 Affordable housing for rent Starter homes Discounted market sales housing Other affordable routes to home ownership
Brownfield Land	See Previously Developed Land.
Core Strategy	This is the key development plan document of the Local Plan which sets out the vision, strategic objectives and strategic policies to guide the pattern and level of development over the 15 year period from adoption.
Core Strategy Partial Review (CSPR)	The partial review of the Core Strategy is being carried out to review those policies which are now out-of-date due to changes in national planning policy and/or local circumstances.
Development Plan	The Development Plan sets out the policies and proposals for development and other use of land in the District. It can be a single document or made up of a number of documents including: Local Plans, Development Plan Documents and Neighbourhood Plan.
Development Plan Documents (DPD)	DPDs are the documents which make up the Local Plan.
Duty-to-Cooperate	The Localism Act 2011 introduced the duty to cooperate. It requires local planning authorities to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.
Employment Need Assessment and Land Review (ELR)	This evidence-base study provides information on the demand for, and the available supply of, land for employment use. It looks at jobs growth and converts this into a land requirement.
Evidence Base	A collection of technical studies on various topics such as housing, employment, environment, transport. These are used to inform the preparation of the policies in the Local Plan.
Green Belt	An area of open land defined on the policies map of the Local Plan which has been designated in line with national policy where strict controls are placed on development in order to check the unrestricted sprawl of large built up areas, safeguard the countryside from encroachment, prevent neighbouring towns from margining into one another, preserve the special character of historic towns, and assist in urban regeneration.

Term	Definition			
Greenfield Land	Land that has not previously been developed. (Also see definition for Previously Developed Land).			
Gypsy and Traveller Community	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.			
Leeds City Region (LCR)	The LCR covers 10 districts in West, North and South Yorkshire. The LCR partnership supports the economic development of the area.			
Local Enterprise Partnership (LEP)	A voluntary partnership of local authorities and businesses which are tasked with creating or improving the conditions for economic growth in the area.			
Local Development Scheme (LDS)	This document sets out the timetable for the preparation of the Local Plan.			
Local Housing Need	The number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.			
Local Plan	A plan for the future development of the local area. It provides policies which are used to determine planning applications. It identifies how much development will take place over the next 15 years and where this will occur. It allocates sites to be developed.			
Local Planning Authority (LPA)	The public authority whose duty it is to carry out specific planning functions for a particular area.			
National Planning Policy Framework (NPPF)	The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.			
National Planning Practice Guidance (NPPG)	The NPPG provides additional guidance on how the policies in the NPPF should be applied. It also provides guidance on how evidence-base documents should be prepared.			
Northern Powerhouse Rail	Northern Powerhouse Rail (NPR) is a major strategic rail programme, designed to transform connectivity between the key economic centres of the North. For Bradford the key initiative is the proposal for a new station on the new line between Leeds and Manchester.			
Previously Developed Land (PDL)	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that			

Term	Definition			
Term	has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface have blended into the landscape.			
Regional Econometric Model (REM)	The Regional Econometric Model provides economic and labour market estimates and forecasts for the UK, Yorkshire & Humber region, districts and city regions.			
Retail and Leisure Study	This study will provide up-to-date information on the current and future capacity for retail and leisure development within the District.			
Site Allocations DPD	The site allocations DPD will allocate the sites that are required to meet the development needs of the District as set out in the Core Strategy.			
Standard Methodology (for calculating Local Housing Need)	This is the calculation used to determine how much housing is needed in the District. The formula is set out in the National Planning Practice Guidance.			
Strategic Economic Plan (SEP)	This plan, prepared by the Leeds City Region LEP, sets out the long-term plan to transform the Leeds City Region economy and create thousands of additional jobs in the next 20 years. It sets out the ambitions for the area and how partnership working between the public and private sector will help to achieve the vision.			
Strategic Housing Land Availability Assessment (SHLAA)	The SHLAA is an evidence base document which assesses the availability, suitability and achievability of potential housing sites. It is used to provide an indication of the scale, nature and distribution of housing land across the district.			
Strategic Housing Market Assessment (SHMA)	The SHMA is an evidence base document which assesses the scale, range, type and tenure of housing that will be required in the district in the future.			
Strategic Policies	These are policies which address the strategic priorities of the area and set out an overall strategy for the pattern, scale and quality of development. They may cover a number of topic areas including employment, retail, leisure and other commercial development as well as infrastructure, community facilities and the environment.			
Viability Assessment	This is a process of assessing whether the development of a site is financially viable. i.e. whether the development of a site provides a reasonable return.			
West Yorkshire Combined Authority (WYCA)	WYCA is the body which covers the Leeds City Region Area and brings together local councils and businesses to work on a collective vision for the area. It covers the 10 districts of Barnsley, Bradford, Calderdale, Craven, Harrogate, Kirklees, Leeds, Selby, Wakefield and York.			

13. Appendix 5 – Personal Data

- A5.1 This appendix provides brief information on, and sets out your rights under the Data Protection Act 2018. Please also refer to the Local Plan Privacy Notice and the Council's Corporate Privacy Notice.
- A5.2 Please note: this section only relates to your personal data (your name, address, or any other data that could be used to identify you personally) rather than the content of your response.
 - 1. The identity of the data controller and the contact details of our data protection officer.

The City of Bradford Metropolitan District Council (CBMDC) is the data controller. The Data Protection Officer can be contacted at: dani.mistry@bradford.gov.uk

2. Why are we collecting your personal data?

Your data is being collected as an essential part of the consultation process, to allow us to contact you regarding the outcomes of the consultation and for statistical purposes.

3. The legal basis for collecting your data

The Data Protection Act 2018 states that as a public body, CBMDC may process personal data as necessary as part of an activity that supports or promotes democratic engagement i.e. a consultation.

4. Who we will share your data with?

Data is not shared outside the local authority except where representations are collected and processed in accordance with the relevant planning regulations.

5. How long will we keep your data for?

Data is retained as long as it is necessary to carry out the functions for which is was originally collected. We will not keep this information for longer than is necessary. In some instances the law sets the length of time information has to be kept.

6. Your rights (e.g. access to the data we hold, rectifying a mistake, deletion of your data).

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a) to see what data we hold about you:
- b) to ask us to stop using your data, but keep it on record;
- c) to ask to have all or some of your data deleted or corrected;
- d) to lodge a complaint if you think we are not handling your data fairly or in accordance with the law.
- 7. Your data will not be used for any automated decision making.
- 8. Your personal data will be stored in a secure Council IT system.



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