
DEVELOPMENT PLAN PANEL

Meeting to be held in Civic Hall, Leeds, LS1 1UR on
Tuesday, 3rd September, 2019
at 1.30 pm

MEMBERSHIP

Councillors

B Anderson
C Campbell
A Carter
C Gruen
J McKenna
N Walshaw (Chair)
S Arif
D Collins
R Finnigan
L Mulherin
K Ritchie

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A G E N D A

Item No	Ward	Item Not Open		Page No
1			<p>APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS</p> <p>To consider any appeals in accordance with Procedure Rule 15.2 of the Access to Information Rules (in the event of an Appeal the press and public will be excluded)</p> <p>(*In accordance with Procedure Rule 15.2, written notice of an appeal must be received by the Head of Governance Services at least 24 hours before the meeting)</p>	
2			<p>EXEMPT INFORMATION - POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC</p> <p>1 To highlight reports or appendices which officers have identified as containing exempt information, and where officers consider that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, for the reasons outlined in the report.</p> <p>2 To consider whether or not to accept the officers recommendation in respect of the above information.</p> <p>3 If so, to formally pass the following resolution:-</p> <p>RESOLVED – That the press and public be excluded from the meeting during consideration of the following parts of the agenda designated as containing exempt information on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present there would be disclosure to them of exempt information, as follows:</p>	

Item No	Ward	Item Not Open		Page No
3			<p>LATE ITEMS</p> <p>To identify items which have been admitted to the agenda by the Chair for consideration.</p> <p>(The special circumstance shall be specified in the minutes).</p>	
4			<p>DECLARATION OF DISCLOSABLE PECUNIARY INTERESTS</p> <p>To disclose or draw attention to any disclosable pecuniary interests for the purposes of Section 31 of the Localism Act 2011 and paragraphs 13-16 of the Members' Code of Conduct</p>	
5			<p>APOLOGIES FOR ABSENCE</p>	
6			<p>CORE STRATEGY SELECTIVE REVIEW UPDATE</p> <p>The report of the Chief Planning Officer provides members of the Development Plan Panel, with an update on the Core Strategy Selective Review prior to the Executive Board meeting on 4th September 2019.</p> <p>(Appendix 1 to follow)</p>	1 - 2
7			<p>BRADFORD CORE STRATEGY PARTIAL REVIEW</p> <p>The report of the Chief Planning Officer advises the Development Plan Panel on proposals set out in Bradford's Core Strategy Partial Review (CSPR) Preferred Options and advises on implications for Leeds.</p> <p>(Report attached)</p>	3 - 24
8			<p>DATE AND TIME OF NEXT MEETING</p> <p>To note the date and time of the next meeting as 10th September 2019 at 13:30.</p>	

Item No	Ward	Item Not Open		Page No
			<p><u>Third Party Recording</u></p> <p>Recording of this meeting is allowed to enable those not present to see or hear the proceedings either as they take place (or later) and to enable the reporting of those proceedings. A copy of the recording protocol is available from the contacts named on the front of this agenda.</p> <p>Use of Recordings by Third Parties– code of practice</p> <ul style="list-style-type: none"> a) Any published recording should be accompanied by a statement of when and where the recording was made, the context of the discussion that took place, and a clear identification of the main speakers and their role or title. b) Those making recordings must not edit the recording in a way that could lead to misinterpretation or misrepresentation of the proceedings or comments made by attendees. In particular there should be no internal editing of published extracts; recordings may start at any point and end at any point but the material between those points must be complete. 	

Third Party Recording

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Use of Recordings by Third Parties– code of practice

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Report author: Robin Coghlan
(0113 3787635)



Report of the Chief Planning Officer

Report to Development Plan Panel

Date: 3rd September 2019

Subject: Core Strategy Selective Review Update

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

Summary of main issues

1. The Core Strategy Selective Review (CSSR) was submitted to the Secretary of State for independent examination in August 2018 with public hearing sessions held during February 2019. The Inspector published Main Modifications to the Plan in May 2019 and consultation was held on these changes between 17th May and 28th June 2019.
2. The Council anticipates receipt of the Inspector's Report in advance of the Executive Board meeting. The Inspector's Report should confirm that the Publication Draft (2017) version of the Plan as amended by the Inspector's recommended MMs is sound. Executive Board is considering the Inspector's report at a meeting on 4 September and is being asked to recommend the Report and the CSSR to full Council for adoption.

Recommendation

3. Development Plan Panel is invited to note the progression of the CSSR and endorse the recommendations within the Executive Board report at **Appendix 1** (to follow).

1 Purpose of this Report

- 1.1 The purpose of this report is to provide members of the Development Plan Panel, with an update on the Core Strategy Selective Review prior to the Executive Board meeting on 4th September 2019. The Executive Board papers will be published on 27th August 2019 and the Inspector's Report and appendices provided to DPP members as a late item at that time.

2 Background Information

- 2.1 See **Appendix 1** Report to Executive Board (to follow).

3 Main Issues

- 3.1 See **Appendix 1** Report to Executive Board (to follow).

4 Next steps

- 4.1 See **Appendix 1** Report to Executive Board (to follow).

5 Corporate Considerations

- 5.1 See **Appendix 1** Report to Executive Board (to follow).

6 Conclusion

- 6.1 See **Appendix 1** Report to Executive Board (to follow).

7 Recommendation

- 7.1 Development Plan Panel is invited to note the progression of the CSSR and endorse the recommendations within the Executive Board report at Appendix 1 (to follow).



Report author: Robin Coghlan
Tel: 0113 378 7635

Report of Chief Planning Officer

Report to Development Plan Panel

Date: 3rd September 2019

Subject: Bradford Core Strategy Partial Review

Are specific electoral wards affected? If yes, name(s) of ward(s): ALL	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has consultation been carried out?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Will the decision be open for call-in?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, access to information procedure rule number: Appendix number:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary

1. Main issues

- 1.1 The purpose of this report is to advise Development Plan Panel on proposals set out in Bradford’s Core Strategy Partial Review (CSPR) Preferred Options and to advise on implications for Leeds. Bradford drafted its Core Strategy Partial Review (CSPR) Preferred Options based on consideration of public representations to its earlier scoping exercise (January 2019) and the conclusions from various aspects of technical evidence. The CSPR Preferred Options are now subject to public consultation from 30th July to 24th September 2019.
- 1.2 The Core Strategy Partial Review is extensive, proposing changes to virtually all parts of the adopted Core Strategy. Many of the changes seek to strengthen policies in line with an updated evidence base and also within the context of Bradford’s declared Climate Change Emergency. The housing requirement is proposed to be reduced with consequent reductions for the sub-areas of Bradford that border Leeds which will reduce the chances of any potential impacts upon Leeds in terms of green belt encroachment and traffic growth.
- 1.3 However, it should be emphasised that this is a strategic and spatial plan, which does not include any site specific allocations. Because of this, there is a lack of clarity at this stage regarding the exact location of proposals, including transport infrastructure and sites at Esholt and Holme Wood. Consequently, the City Council will need to make further comments once further site specific details are available. Regarding

proposed housing distribution within the sub-areas, clarity will only become apparent when proposals for the Bradford Site Allocations Plan are advanced.

- 1.4 There are particular concerns about the reduction in the number of Gypsy and Traveller accommodation pitches that are being planned for. Leeds needs to be satisfied that sufficient provision is being made in terms of the evidence of need to ensure that additional pressure to accommodate Gypsies and Travellers is not generated for Leeds.

2 **Best Council Plan Implications.**

- 2.1 Local Plans can have a range of impacts on the Best Council Plan (BCP) priorities including inclusive growth, regeneration, health and wellbeing, high quality housing, sustainable infrastructure, environmental enhancement, a child friendly city and an age friendly city. As well as ensuring that Leeds' Plans are prepared to contribute positively to the BCP, it is important to consider the potential impact of the Local Plans of neighbouring local authorities and submit representations to the neighbouring local authorities as appropriate.

3 **Resource Implications.**

- 3.1 Considering and commenting on the impact of Plans of neighbouring local authorities can be met through existing budgets.

4 **Recommendations.**

- a) To note and comment on the Council's proposed response to Bradford City Council.

1 Purpose of this report

- 1.1 The purpose of this report is to advise Development Plan Panel on proposals set out in Bradford's Core Strategy Partial Review (CSPR) Preferred Options and to advise on implications for Leeds.

2 Background information

- 2.1 Leeds shares an administrative boundary with Bradford, with designated Green Belt straddling the boundary. There are significant transport connections between the two areas and with some overlap of infrastructure such as schools and green space. It is therefore important that the spatial planning intentions of Bradford City Council are understood and implications for Leeds considered. Within this context, the City Council has worked closely with Bradford Council for a number of years to ensure that any potential 'cross boundary' issues are understood and potential impacts are avoided or mitigated where necessary.
- 2.2 Bradford City Council adopted its Core Strategy in 2017. It sets out Bradford's housing requirement and high level planning strategy for all of the areas of Bradford. The council undertook a scoping exercise to update its Core Strategy in January 2019. It subsequently drafted its Core Strategy Partial Review (CSPR) Preferred Options based on consideration of public representations received and the conclusions from various aspects of technical evidence. The CSPR Preferred Options are now subject to public consultation from 30th July to 24th September 2019.

3 Main issues.

3.1 Overview

- 3.1.1 Although classed as a partial review Bradford's CSPR is extensive in seeking to update the majority of policy areas of the Core Strategy. The only areas not within the scope of the CSPR are Minerals, Waste Management and Design. The following paragraphs summarise the main aspects of Bradford's CSPR including overall strategy, the new housing requirement, distribution of growth in the sub-areas of Bradford and other thematic areas. As well as providing an overall picture of Bradford's proposals, where there are particular implications for Leeds, these are set out at the end of each policy area.
- 3.1.2 Appendix 1 sets out Bradford's consultation questions with proposed overall comments and suggested Leeds responses to Bradford.

3.2 Section 1: Plan Period

- 3.2.1 A period of 2020 – 2037 is proposed, which meets the national policy minimum of 15 years from adoption, with allowance of 2 years for slippage. This poses no concerns for Leeds District

3.3 Section 3: Spatial Vision, Objectives and Core Policies.

Vision and Key Spatial Priorities

- 3.3.1 The "Vision" is the same as the 2017 Core Strategy. Bradford becomes attractive to live, work and visit with growth in the city and the towns of Airedale and Wharfedale. Economic transformation is anticipated. This poses no concerns for Leeds District.

Core Policies

- 3.3.2 Only 6 of the 10 Strategic Core Policies are subject to review. The essence of the Key Spatial Priorities in Policy SC1 is the same. There is increased emphasis on low carbon, inclusive, healthy and high quality growth. Shipley, Manningham, Holme Wood and Keighley are specified as locations for regeneration. The changes proposed to Policy SC2 concerning climate change and to Policy SC6 concerning green infrastructure will have the effect of strengthening policy in the context of Bradford's declaration of a climate change emergency.
- 3.3.3 In terms of preferences for the location of new development (Policy SC5) the first priority remains previously developed land (PDL) in the urban areas and settlements. Second priority remains green field opportunities, but which must be "sustainable". Third priority is Green Belt, with wording "limited release". The fourth priority of large urban extensions is deleted. The provisos are amended with a greater focus on sustainable accessibility by walking, cycling and public transport.
- 3.3.4 The proposed changes to the Green Infrastructure Policy SC6 asks new development to address gaps in the network with provision of links and there is increased emphasis on protection of green spaces and provision of community gardens and local food growing.
- 3.3.5 Proposed changes to Policy SC7 (Green Belt) acknowledge that land will need to be taken out of the Green Belt to accommodate housing growth and that the Housing and Sub Area policies will advise on the shape of Green Belt change in different areas. Policy on designating Safeguarded Land is introduced for long term growth.
- 3.3.6 An entirely new policy SC10 is proposed with the name "Creating Healthy Places". This combines several existing policy areas concerning sustainable travel, climate change, environment, minimisation of pollution and support for local services.
- 3.3.7 The proposed changes to the Core Policies are generally positive in continuing to locate the majority of growth on the urban more sustainable parts of Bradford. This broad approach reflects the broad approach of the adopted Leeds Core Strategy and Site Allocations Plan, in seeking to deliver the focus of regeneration and growth within the City Centre and Main Urban Area. There are clearer implications from proposed changes to the Sub-Area policies (see below). It is therefore suggested that Leeds' comments to Bradford on all the changes to the Core Policies are broadly supportive, noting the need for Leeds and Bradford to work together on how Green Infrastructure connects across the administrative boundary. It should be noted that through the adopted Leeds Core Strategy and Site Allocations Plan, Leeds already has established strategic and local policies in place to protect and enhance Green Infrastructure and Corridors.

Key Diagram

- 3.3.8 The Key Diagram in the Adopted Core Strategy will be replaced by a new Key Diagram plan in the partial review. Employment Growth Areas are no longer shown (including the land at Esholt near Apperley Bridge). The Urban Extension notation is revised and the proposed new transport links between Leeds Bradford Airport, Bradford and North Kirklees are not shown. Therefore, it is suggested that Leeds' comment to Bradford that the Council notes the removal of the Employment Growth Areas including land near to Apperley Bridge railway station and the absence of

transport improvement corridors. Once clarified, Leeds may reserve the right to submit further comments.

3.4 Section 4: Sub Area Policies.

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

3.4.1 The housing numbers are proposed to reduce for North East Bradford (4,400 to 2,000) and South East Bradford (6,000 to 3,100).

B. Urban Regeneration Priorities

3.4.2 7 key regeneration areas are added to the policy, 3 of which adjoin the Leeds boundary these are:

- North East Bradford – Ravenscliffe and Thorpe Edge (near to Thornbury and Calverley);
- East Bradford - Barkerend, Beech Grove, Bradford Moor, Thornbury, Woodhall and Laisterdyke (near to Pudsey and Tyersal); and
- South East Bradford – Bierley and Holme Wood (near to Pudsey and Tyersal).

However, no plan is provided to show the location of these areas. Therefore, it is suggested that the Council's comment to Bradford notes the absence of a plan showing the location of the Key Regeneration Areas that can be included in the next stage of Bradford's CSPR. Leeds may reserve the right to comment further once the implications of the location of the regeneration areas are understood.

C. Growth proposed in the City of Bradford

3.4.3 North East Bradford – the reference to the employment opportunity at Apperley Bridge is revised to “premium quality employment sites creating space for high tech, bio-tech, environmental and research and development specialisms” and the reference to Apperley Bridge is removed. It is not clear although it is presumed that this relates to the Esholt water treatment works at Apperley Bridge (an area of previously developed land located within the Green Belt). Therefore, it is suggested that the Council seeks clarification on which area this reference relates and reserves its position to submit further comments once clarity is provided, through the plan-making process.

3.4.4 South East Bradford this section has been revised to include maximising opportunities for connectivity to the wider City Region with reference to the Bierley and Holme Wood Regeneration Areas and the Sustainable Urban Extension within the Green Belt. This will be a significant consideration for the Outer West and Outer North West HMCAs of Leeds in terms of impact on the Green Belt wedge between Leeds and Bradford, highways and education considerations and local community interests. Therefore, it is suggested that the Council seeks further discussion with Bradford to understand the extent of Green Belt land affected and how it relates to the Leeds boundary and reserves its position to submit further comments once clarity has been provided.

F. Transport

- 3.4.5 A new criteria is added to improve highway and public transport access to Leeds Bradford Airport (LBA) and North Kirklees including a new MASS transit system¹ and improvements to the junction of Harrogate Road and New Line. Whilst this is potentially good news for Leeds, the Council needs to be clear on the status and location of the proposed highway access from LBA to North Kirklees and the key diagram does not include transport proposals. Therefore, it is suggested that the Council supports the objective to improve access to LBA and highway improvements along the corridor between Leeds and Bradford in principle but also requests further discussions with Bradford on how this would impact and / or benefit Leeds including key junctions such as at Greengates, again reserving our position to submit further comments once this detail is understood.

Sub Area Policy AD1: Airedale

- 3.4.6 Baildon which lies close to the Leeds boundary at Guiseley falls within Airedale sub area. The CSPR proposes a reduction in housing numbers from 350 to 250 which will include sites within the urban area together with some limited Green Belt release. It is suggested that the Council supports the reduction in housing numbers but seeks further consultation with Bradford on its Site Allocation Plan process on the location of the Green Belt release sites and how they relate to the boundary with Leeds.

Sub Area Policy WD1: Wharfedale

- 3.4.7 Burley in Wharfedale and Menston lie within this sub area close to the boundary with Guiseley. The CSPR proposes a reduction in housing numbers from 700 to 550 in Burley in Wharfedale which will be accommodated through a mix of sites including significant contribution from Green Belt releases. However, in Menston the CSPR proposes a reduction in housing numbers from 600 to 300 which will no longer require the release of any Green Belt land, instead relying upon permissions and opportunities within the settlement boundary. It is suggested that the Council supports the reduction in housing numbers and the non-Green Belt delivery option for Menston but seeks further engagement with Bradford on its Site Allocation Plan process.

3.5 Section 4: Employment

- 3.5.1 Bradford recognise from the demographic makeup of their District that they need to improve the economic Growth of the City. With this in mind they have made substantial changes to three of their employment Policies and minor changes to one. It is considered that none of the proposed policy changes would have negative implications for Leeds. A fuller description is set out in Appendix 1.

3.6 Section 5: Transport and Movement

- 3.6.1 Most of the transport policies are high level setting out broad transport related objectives. In particular there is a focus on sustainable improvements which dovetail with Climate Emergency agendas of both Leeds and Bradford. Recognition is given to electric vehicle infrastructure, access for all, sustainability and inclusive design.

¹ The Leeds City Region Connectivity Strategy has identified the need to integrate a mass transit system across the core urban areas to connect high density local communities and labour markets into the national hubs and centres as part of an integrated public transport system. Mass transit can mean light rail or tram.

However, it is suggested that the following policies will require comments from Leeds.

Policy TR5: Strategic Transport Delivery.

- 3.6.2 The policy includes reference to a MASS Transit System: Fixed Link between Bradford and Leeds Bradford Airport and Bradford-North Kirklees, delivered through new routes, and incorporating changes to existing and former rail lines; and the provision of new highway networks and infrastructure including additions to the Primary Road Network / Key Route Network in South East Bradford and Shipley to reduce congestion, unlock strategic sites for housing and employment growth and provide support for regeneration areas. Reference is also made to new and expanded park and ride sites and associated infrastructure in key strategic locations across the district. In the suggested response to Bradford, Leeds will welcome further discussions on this and again reserve its position to submit further comment once the detail is known.

Policy TR6: Freight

- 3.6.3 Criteria K. refers to a new freight park site within south Bradford but it is not clear where this is or whether there would be impacts on Leeds. Therefore, it is suggested that our comment asks Bradford for clarity on the location of the site and how it affects Leeds before we submit further detailed comments if applicable.

3.7 Section 5: Housing

Housing Requirement

- 3.7.1 Policies HO1 sets out Bradford's proposed new housing requirement of 1,703 dwellings pa (28,951 2020-37) which is considerably lower than the current requirement of 2,473pa. It uses the government's Standard Method with no uplifts (to reflect economic ambition or inclusive growth). From Bradford's perspective, local economic evidence (low job densities, low economic activity rates and relatively high unemployment) does not justify such an uplift. The lower housing requirement will reduce the amount of land that will have to be identified for housing growth. For Leeds, this will mean that there is less likelihood of potential impacts than the current adopted policies in terms of green belt encroachment and traffic growth.

Housing supply and distribution

- 3.7.2 Policies HO2-HO4 deal with the sources of housing supply, distribution of housing to Bradford's sub areas and managing delivery of housing. There are no major changes proposed that would have a significant impact upon Leeds (although further details will need to be provided through the Bradford Site Allocations Plan and Leeds City Council will have the opportunity to comment on this Plan at an early stage via the Duty to Co-operate process). Reductions to the housing targets are made fairly uniformly across Bradford's sub-areas; only the City Centre bucks the trend with an increase from 3,500 to 4,000 dwellings over the plan period.

Housing Standards

- 3.7.3 Policies HO5 – HO11 concern housing density, use of Previously Developed Land, and requirements for mix, affordable housing, accessible housing and minimum space standards. Like Leeds, Bradford is seeking to improve requirements for quality of new housing. There are not considered to be any adverse implications for Leeds.

Gypsy and Traveller Accommodation

3.7.4 Policy HO12 concerns provision for Gypsy and Traveller accommodation. The CSPR proposes significant reductions in provision:

- from 39 to 10 Gypsy and Traveller pitches,
- from 7 to 5 transit pitches and
- from 45 to 0 (zero) travelling showpeople pitches.

3.7.5 A Gypsy and Traveller Accommodation Assessment gives regard to new definitions which reduces the level of need. Officers are concerned about the robustness of the evidence in demonstrating realistic levels of need. If insufficient provision is made in Bradford, an implication for Leeds could be greater stress is placed on sites in Leeds. It is therefore suggested that a comment is made that dialogue take place between Leeds and Bradford which involves the Gypsy and Traveller Exchange (GATE). Members will recall that the Inspectors for the Site Allocations Plan highlighted our approach to consultation with GATE as being an area of good practice and we therefore propose to suggest the same approach to Bradford. A more detailed explanation is provided in Appendix 1.

3.8 Section 5: Environment.

3.8.1 The changes to the Bio Diversity policies seeks to protect and enhance biodiversity and geodiversity within the District, setting out the hierarchy of protected sites and identifying principles for enhancing the overall biodiversity resource.

3.8.2 As Bio-Diversity issues, by their very nature, are cross boundary and strategic Leeds fully supports the changes to this Policy. This Policy supports the work currently being undertaken by Leeds to review our local wildlife sites and the identification of the Leeds Wildlife Habitat Network which connects directly across the boundary with Bradford.

3.8.3 The other Environmental Policies seek to promote improvements that align with the overall agenda of the Climate Emergency.

3.8.4 No adverse implications for Leeds are envisaged.

4 Corporate considerations

4.1 Consultation and engagement

4.1.1 As Bradford City Council is preparing the CSPR it is responsible for public consultation on the proposals. The period of consultation on the CSPR preferred options runs from 30th July to 24th September 2019. Bradford and Leeds are members of the Leeds City Region Strategic Planning Duty to Co-operate Group which meets every two months in Leeds and allows for continuous engagement on the local plans being prepared by local authorities.

4.2 Equality and diversity / cohesion and integration

4.2.1 As Bradford City Council is preparing the CSPR it is responsible for ensuring that the implications for equality, diversity, cohesion and integration are understood and dealt with. An Equality Impact Assessment is provided as a background document. At 94 pages it seems to be a thorough assessment of equality impacts.

4.3 Council policies and the Best Council Plan

- 4.3.1 Many of the proposed changes to the Bradford Core Strategy accord well with Leeds' Best Council Plan (2019/20 – 2020/21). This report highlights any of the changes that might impact negatively on Leeds' BCP priorities, for example Green Belt gaps between Leeds and Bradford, Green Infrastructure between Leeds and Bradford and implications of new development sites generating traffic and implications of transport investment that might relieve corridors and junctions. These can impact on BCP agendas for Health & Wellbeing, Sustainable Infrastructure and Safe & Strong Communities.

5 Climate Emergency

- 5.1.1 Bradford City Council also declared a Climate Emergency in January 2019 so many of the CSPR changes seek to strengthen policy that could help reduce carbon emissions and policy that promotes Green Infrastructure.

5.2 Resources, procurement and value for money

- 5.2.1 The cost of checking and commenting on Bradford's Core Strategy Partial Review has been met from existing budgets.

5.3 Legal implications, access to information, and call-in

- 5.3.1 Local authorities have a duty to cooperate with each other about strategic planning proposals and to consult each other on preparation of their development plans.

5.4 Risk management

- 5.4.1 No risks are identified.

6 Conclusions

- 6.1 Extensive changes are being proposed by Bradford City Council to its Core Strategy through the Core Strategy Partial Review which are mostly supported. The housing requirement is proposed to be reduced with consequent reductions for the sub-areas of Bradford that border Leeds which will reduce the chances of any potential impacts for Leeds in terms of green belt encroachment and traffic growth.

- 6.2 However, there is a lack of clarity about the exact location of proposals including transport infrastructure and sites at Esholt and Holme Wood for which further comments may be necessary once the proposals are better understood and made more explicit through the preparation of the Bradford Site Allocations Plan. In relation to Esholt, Leeds City Council is aware of a current planning application for the site and has made officer comments on these proposals, as part of the on going dialogue with Bradford. Regarding proposed housing distribution within the sub-areas, clarity will only become apparent when proposals for the Site Allocations Plan are advanced.

- 6.3 There are particular concerns about the reduction in the number of Gypsy and Traveller accommodation pitches that are being planned for. Leeds needs to be satisfied that sufficient provision is being made in terms of the evidence of need to ensure that additional pressure to accommodate Gypsies and Travellers is not generated for Leeds.

7 Recommendations

7.1 To note and comment on the Council's proposed response to Bradford City Council.

8 Background documents²

8.1 **None**

² The background documents listed in this section are available to download from the council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

Appendix 1

Area	Policy Number	Page Number	Description of Policy and Changes	LCC Comments
Plan Period	N/A	12	<p>A revised plan period of 2020-2037 is proposed.</p> <p>Q1. Please provide your comments for the preferred plan period and any suggested changes?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Text for Representation No comment or concern from Leeds</p>
Spatial Vision	N/A	18	As written only the plan date has changed from the original version	No comment
Strategic Core Policy Overall Approach and Key Spatial Priorities	SC1	20	<p>Preferred Option: Strategic Core Policy SC1: Overall Approach and Key Spatial Priorities</p> <p>The Preferred Option makes reference to the updated plan period, a consistent approach to growth and regeneration and includes enhanced reference to climate change and healthy communities.</p> <p>Q2. Please provide your comments for Policy SC1 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments The essence of the Key Spatial Priorities in Policy SC1 is the same. There is increased emphasis on low carbon, inclusive, healthy and high quality growth. Shipley, Manningham, Holme Wood and Keighley are specified as locations for regeneration.</p> <p>Text for Representation No comment or concern from Leeds</p>
Strategic Core Policy Climate Change and Resource Use	SC3	26	<p>Preferred Option: Strategic Core Policy SC2: Climate Change and Resource Use</p> <p>This policy sets out the strategic approach for tackling climate change. In particular it looks at how we should be planning for the adaptation and long-term resilience to the impacts of climate change as well as how we can mitigate against the impacts.</p> <p>The preferred option for the updated policy includes new references to Green Infrastructure (identifying its importance in helping to adapt to climate change) and air quality (seeking to improve air quality through reduced emissions by improving public transport and active travel options). This will further help to ensure that Bradford continues to transition towards a low-carbon economy and society whilst enhancing the resilience to the potential impact of climate change.</p> <p>Q3. Please provide your comments for Policy SC2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments The changes proposed to Policy SC2 concerning climate change will have the effect of strengthening policy in the context of Bradford’s declaration of a climate change emergency.</p> <p>Text for Representation No comment or concern from Leeds</p>
Strategic Core Policy Location of development	SC5	27	<p>Preferred Option: Strategic Core Policy SC5: Location of Development</p> <p>The preferred policy now primarily includes changes to Green Belt site prioritisation and a reordered movement hierarchy.</p> <p>Q4. Please provide your comments for Policy SC5 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments In terms of preferences for the location of new development in Policy SC5 the first priority remains previously developed land (PDL) in the urban areas and settlements. Second priority remains green field opportunities, but which must be “sustainable”. Third priority is Green Belt, with wording “limited release”. The fourth priority of large urban extensions is deleted. The provisos are amended with a greater focus on sustainable accessibility by walking, cycling and public transport.</p> <p>Text for Representation No comment or concern from Leeds</p>
Strategic Core Policy Green Infrastructure	SC6	31	<p>Preferred Option: Strategic Core Policy SC6: Green Infrastructure</p> <p>This policy sets out the strategic approach to protecting the District’s key Green Infrastructure assets.</p>	<p>DtC / Overall Comments The climate emergencies declared by Leeds and Bradford support any Strategic and other policies that maintain and improve the overall aim of the emergency. With this in mind it is clear that the objectives of the Policy align with the direction taken by Leeds.</p>

Area	Policy Number	Page Number	Description of Policy and Changes	LCC Comments
			<p>The Preferred Option updates this policy to include a requirement for new development to identify opportunities to link together areas of Green Infrastructure, particularly where gaps exist in the network. It also strengthens the policy approach to protecting Green Infrastructure network.</p> <p>Q5. Please provide your comments for Policy SC6 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>The river corridors of the Aire, Wharfe and the South Pennine Moors all extend into Leeds from the West. Any policies that maintain and improve these corridors specifically and Green Infrastructure generally are to be supported in light of the Strategic DtC aims.</p> <p>Text for Representation</p> <p>Generally supportive of greater focus of addressing Climate Emergency. No specific comment at this time. Expect continuing Cross-Boundary working to maintain and improve Green Infrastructure.</p>
Strategic Core Policy Green Belt	SC7	40	<p>Preferred Option: Strategic Core Policy SC7: Green Belt</p> <p>The policy has been updated to provide clearer strategic policy direction on Green Belt release priorities and links through to supporting thematic and sub area policies. A new section has also been added on safeguarded land.</p> <p>Q6. Please provide your comments for Policy SC7 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>The major changes to this Policy link through to the overall reduction in the objectively assessed need for Bradford (see later policies)</p> <p>As every sub-area in Bradford apart from the City Centre is showing a reduction in housing numbers, the impact on Leeds is likely to be reduced.</p> <p>Text for Representation</p> <p>No comment or concern from Leeds. Continuing cross boundary working to maintain an effective Green Belt.</p>
Strategic Core Policy Protecting the South Pennine Moors SPA and South Pennine Moors SAC and their zone of influence.	SC8	43	<p>Preferred Option: Strategic Core Policy SC8: Protecting the South Pennine Moors and their Zone of Influence</p> <p>The purpose of this policy is to avoid any potential adverse impacts on the South Pennine Moors SPA and SAC, yet allow development to take place in locations and on a scale where potential impacts are at such a level that there is confidence that avoidance and mitigation measure can be effective.</p> <p>Q7. Please provide your comments for Policy SC8 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>The proposed changes to Policy SC8 reflect the increased importance of the climate emergency declared by Bradford</p> <p>Text for Representation</p> <p>Generally supportive of greater focus of addressing Climate Emergency. No specific comment at this time.</p>
Strategic Core Policy Creating healthy places	SC10	49	<p>Preferred Option: Strategic Core Policy SC10: Creating Healthy Places</p> <p>The policy provides a strategic context to creating healthy places, introduces health impact assessments for major developments and policy on the location of new health facilities / infrastructure.</p> <p>Q8. Please provide your comments for Policy SC10 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>New Policy SC10 reflects the increased importance of the health and well-being agenda and climate emergency adopted by Bradford</p> <p>Text for Representation</p> <p>Support for policy intentions. No specific comment at this time.</p>
Draft Key Diagram	Figure 3.1	52	<p>No specific consultation question is set concerning the Key Diagram</p>	<p>DtC / Overall Comments</p> <p>The Key Diagram in the Adopted Core Strategy has been replaced by a new Key Diagram plan in the partial review – Employment Growth Areas are no longer shown (including the land at Esholt near Apperley Bridge). The Urban Extension notation is revised</p> <p>Text for Representation</p> <p>The Employment Growth Areas including land near to Apperley Bridge railway station ought to be shown</p>

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Sub Area Policy BD1 The Regional City of Bradford including Shipley and Lower Baildon	BD1	57	<p>Preferred Option: Sub Area Policy BD1: The Regional City of Bradford including Shipley and Lower Baildon</p> <p>Update to the policy to include updated distribution of growth figures and alignment with other updated policies.</p> <p>Q9. Please provide your comments for Policy BD1 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments The housing numbers are proposed to reduce for North East Bradford (4,400 to 2,000) and South East Bradford (6,000 to 3,100).</p> <p>Text for Representation Support for housing number changes.</p>
Sub Area Policy BD2 Investment Priorities for the Regional City of Bradford including Shipley and Lower Baildon	BD2	63	<p>Preferred Option: Sub Area Policy BD2: Investment Priorities for the Regional City of Bradford including Shipley and Lower Baildon</p> <p>Policy has been updated to generally reflect changes to Policy BD1 and updates to strategic and thematic policies.</p> <p>Q10. Please provide your comments for Policy BD2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments 7 key regeneration areas are added to the policy, 3 of which adjoin the Leeds boundary. The section regarding South East Bradford has been revised to include maximising opportunities for connectivity to the wider City Region, reference to the Bierley and Holme Wood Regeneration Areas and the Sustainable Urban Extension within the Green Belt.</p> <p>Text for Representation There is an absence of a plan showing the location of the Key Regeneration Areas. Leeds may reserve the right to comment further once the implications of the location of the regeneration areas are understood.</p> <p>It is presumed that the employment opportunity at Apperley Bridge refers to the Esholt Water Treatment Works, but can this be confirmed? Further comment by Leeds may be necessary when further details are provided.</p> <p>Regarding proposals to improve connectivity to the wider City Region with reference to the Bierley and Holme Wood Regeneration Areas and the Sustainable Urban Extension Leeds would welcome further discussion with Bradford to understand the extent of Green Belt land affected and how it relates to the Leeds boundary and reserves its position to submit further comments once clarity has been provided.</p> <p>Regarding proposals for improved highway and public transport access to Leeds Bradford Airport (LBA) and North Kirklees Leeds would welcome further discussions with Bradford on how this would impact and / or benefit Leeds.</p>
Sub Area Policy AD1 Airedale	AD1	65	<p>Preferred Option: Sub Area Policy AD1: Airedale</p> <p>Update to the policy to include updated distribution of growth figures and alignment with other updated policies.</p> <p>Q11. Please provide your comments for Policy AD1 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments Baildon which lies close to the Leeds boundary at Guiseley falls within Airedale sub area. The housing numbers have reduced from 350 to 250 which will include sites within the urban area together with some limited Green Belt release.</p> <p>Text for Representation Support the reduction in housing numbers.</p> <p>Seek further consultation with Bradford through the site allocations process on the location of the GB sites and how they relate to the boundary with Leeds</p>
Sub Area Policy AD2 Investment Priorities for Airedale	AD2	68	<p>Preferred Option: Sub Area Policy AD2: Airedale</p> <p>Policy has been updated to generally reflect changes to Policy AD1 and updates to strategic and thematic policies.</p>	<p>DtC / Overall Comments</p> <p>Text for Representation</p>

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			<p>Q12. Please provide your comments for Policy AD2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	No comment
Sub Area Policy WD1 Wharfedale	WD1	70	<p>Preferred Option: Sub Area Policy WD1: Wharfedale</p> <p>Update to the policy to include updated distribution of growth figures and alignment with other updated policies.</p> <p>Q13. Please provide your comments for Policy WD1 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Burley in wharfedale and Menston lie within this sub area close to the boundary with Guiseley. The housing numbers have reduced from 700 to 550 in Burley in Wharfedale which will be accommodated through a mix of sites including significant contribution from Green Belt changes. In Menston the housing numbers have also reduced from 600 to 300 based on existing permissions and other opportunities within the settlement boundary.</p> <p>Text for Representation</p> <p>Support the reduction in housing numbers.</p> <p>Seek further consultation with Bradford through the site allocations process on the location of the GB sites and how they relate to the boundary with Leeds</p>
Sub Area Policy WD2 Investment Priorities for Wharfedale	WD2	73	<p>Preferred Option: Sub Area Policy WD2: Wharfedale</p> <p>Policy has been updated to generally reflect changes to Policy WD1 and updates to strategic and thematic policies.</p> <p>Q14. Please provide your comments for Policy WD2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Text for Representation</p> <p>No comment</p>
Sub Area Policy PN1 South Pennine Towns and Villages	PN1	74	<p>Preferred Option: Sub Area Policy PN1: South Pennine Towns and Villages</p> <p>Update to the policy to include updated distribution of growth figures and alignment with other updated policies.</p> <p>Q15. Please provide your comments for Policy PN1 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Changes to a sub-area of Bradford that is distant from Leeds' boundary.</p> <p>Text for Representation</p> <p>No Comment</p>
Sub Area Policy PN2 Investment Priorities for the Pennine Towns and Villages	PN2	77	<p>Preferred Option: Sub Area Policy PN2: Investment Priorities for the Pennine Towns and Villages</p> <p>Policy has been updated to generally reflect changes to Policy PN1 and updates to strategic and thematic policies.</p> <p>Q16. Please provide your comments for Policy PN2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Text for Representation</p> <p>No Comment</p>
Policy EC1 Creating a successful and competitive Bradford District	EC1	84	<p>Preferred Option:</p> <p>Policy EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region</p>	<p>DtC/ Overall Comments</p> <p>Policy is high level and explores broad economic growth objectives.</p> <p>Text for Representation</p>

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economy within the Leeds City Region			<p>Policy EC1 has been subject to a major rewrite to align with the new economic growth strategy for the District.</p> <p>Q17. Please provide your comments for Policy EC1 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	No specific comment at this time.
Policy EC2 Employment Land, Job Skills Requirements	EC2	90	<p>Preferred Option:</p> <p>Policy EC2: Employment Land, Jobs and Skills Requirements</p> <p>Significant redrafting and refocusing of the policy to consider new employment land requirements, priority sectors and focus upon engraining local skills and training development opportunities.</p> <p>Q18. Please provide your comments for Policy EC2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC/Overall Comments</p> <p>This Policy builds on Policy EC1 by promoting a desired priority distribution pattern across the sub-region. It also promotes an associated employment typology against the identified areas.</p> <p>The policy also promotes the use of the development process, 106 agreements and better links with the educational sector to further economic growth.</p> <p>Text for Representation</p> <p>No specific comment at this time.</p>
Policy EC3 Employment and Skills Delivery	EC3	93	<p>Preferred Option:</p> <p>Policy EC3: Employment and Skills Delivery</p> <p>Policy has been subject to significant redrafting to more clearly focus upon policy delivery, identifies key areas of employment space and skills.</p> <p>Q19. Please provide your comments for Policy EC3 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC/Overall Comments</p> <p>This Policy is proposed to be amended to give a stronger steer on the types of employment uses appropriate to different areas of the city, with offices and research uses favoured in Bradford city centre and industrial/storage uses in Bradford main urban area and Airedale.</p> <p>Text for Representation</p> <p>No Comment</p>
Policy EC5 City, Town, District and Local Centres	EC5	96	<p>Preferred Option:</p> <p>Policy EC5 City, Town, District and Local Centres</p> <p>Minor changes to policy aligned to updated evidence base and national policy changes.</p> <p>Q20. Please provide your comments for Policy EC5 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC/ Overall Comments</p> <p>Minor changes. Policy has negligible impact on Leeds</p> <p>Text for Representation</p> <p>No specific comment at this time.</p>
Policy TR1 Travel reduction and Modal Shift	TR1	106	<p>Preferred Option:</p> <p>Policy TR1: Travel Reduction and Modal Shift</p> <p>General update to the policy to include a clearer focus and prioritisation upon public transport, cycling, walking and reducing air pollution.</p> <p>Q21. Please provide your comments for Policy TR1 and any suggested changes to the policy?</p>	<p>DtC/ Overall Comments</p> <p>Policy is fairly high level and explores broad Transport related objectives. There is a particular focus on sustainable improvements which dovetail with the Climate emergency agenda. The objectives of the Policy align with the climate emergencies declared by Leeds and Bradford</p> <p>Text for Representation</p> <p>No specific comment at this time.</p>

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			If you would support an alternative to the preferred option, please provide further details and evidence to support this.	
Policy TR2 Parking Policy	TR2	109	<p>Preferred Option:</p> <p>Policy TR2: Car Parking Policy</p> <p>Policy updated to increase levels of active travel by integrating cycle parking and facilities in new development and encouraging the use of electric vehicles through the integration of charging points in developments.</p> <p>Q22. Please provide your comments for Policy TR2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC/ Overall Comments</p> <p>Little significant change in comparison to the existing Policy except the recognition of electric vehicles and the associated infrastructure. Also a greater focus on access for all.</p> <p>Text for Representation</p> <p>No specific comment at this time.</p>
Policy TR3 Integrating Sustainable Transport and Development	TR3	112	<p>Preferred Option:</p> <p>Policy TR3: Integrating Sustainable Transport and Development</p> <p>Updated policy to take account of the use of electric vehicles as a sustainable mode of transport and the wider sustainability of car use in sustainable travel and thus a more integrated approach to sustainable travel is potentially required.</p> <p>Q23. Please provide your comments for Policy TR3 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC/Overall Comments</p> <p>A change in focus from the previous Policy to encompass the greater breadth of 'sustainability' and good inclusive design.</p> <p>Also has included a new paragraph asking for a Design and Access Statement that demonstrate inclusivity and accessibility for disabled people.</p> <p>Text for Representation</p> <p>No specific comment at this time.</p>
Policy TR5 Strategic Transport Delivery and Investment Priorities	TR5	116	<p>Preferred Option:</p> <p>Policy TR5: Strategic Transport Delivery and Investment Priorities</p> <p>Wide ranging update and refocus of the policy.</p> <p>Q24. Please provide your comments for Policy TR5 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC/Overall Comments</p> <p>A significant re-write of this policy. The title was changed from 'Improving Connectivity and Accessibility' to 'Strategic Transport Delivery'.</p> <p>Part B concerning public transport refers to a new MASS transit system between Bradford and LB Airport and North Kirkleees</p> <p>Part C concerning highways refers to new road infrastructure in SE Bradford and Shipley to unlock strategic sites and reduce congestion.</p> <p>Text for Representation</p> <p>Leeds would welcome further discussion on planning for public transport and road infrastructure proposals that affect Leeds. Leeds reserve its position to submit further comment once the detail is known.</p>
Policy TR6 Freight	TR6	120	<p>Preferred Option:</p> <p>Policy TR6: Freight</p> <p>The policy now includes the need to address inappropriate HGV parking within residential areas is considered a corporate priority, and the Council consider Criteria K. to further support industrial and warehousing sectors by promoting improved freight infrastructure and services.</p> <p>Q25. Please provide your comments for Policy TR6 and any suggested changes to the policy?</p>	<p>DtC/Overall Comments</p> <p>Minimal changes. Addition of potential site for HGV parking in South Bradford. Minimal Impact on Leeds.</p> <p>Text for Representation</p>

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			If you would support an alternative to the preferred option, please provide further details and evidence to support this.	Regarding the reference in criterion K to a new freight park site within south Bradford, can the location of the site be clarified? Leeds reserves its position to comment once the location is known and the implications for Leeds can be considered.
Policy HO1 The Districts Housing Requirement	HO1	132	<p>Preferred Option:</p> <p>Policy HO1: Housing Requirement</p> <p>The Preferred Option makes reference to the updated housing requirement figure for the plan period, consistent with the government's standard method approach for calculating Local Housing Need.</p> <p>Q26. Please provide your comments for Policy HO1 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Bradford's proposed new housing requirement of 1,703 dwellings pa (28,951 2020-37) is considerably lower than the current requirement of 2,473pa</p> <p>Text for Representation</p> <p>Reduction in housing requirement is supported</p>
Policy HO2 Strategic Sources of Housing Supply	HO2	137	<p>Preferred Option:</p> <p>Policy HO2: Strategic Sources of Housing Supply</p> <p>This Policy sets out the sources of supply which the Council will consider to meet the housing requirement set out in Policy HO1. The policy has been updated to bring it in line with the revised strategic priorities of the Core Strategy.</p> <p>Q27. Please provide your comments for Policy HO2 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Text for Representation</p> <p>Revisions to the sources of housing supply are supported</p>
Policy HO3 Distribution of Housing Development	HO3	151	<p>Preferred Option:</p> <p>Policy HO3: Housing Distribution</p> <p>While Policy HO1 determines the total housing requirement for the district (26,150 new homes between 2020 and 2037) Policy HO3 determines how they will be distributed between the different areas, towns and villages. The preferred approach is to focus most growth on the urban areas where population and household growth is greatest, and where jobs, services and infrastructure are concentrated. It also reflects the scale and distribution of deliverable and developable land, environmental constraints such as wildlife, flood risk and heritage and the need to promote regeneration in certain areas.</p> <p>The preferred option places 18,400 in the Regional City of Bradford (70% of total) 4,800 in Airedale 1,425 in Wharfedale and 1,525 in the Pennine Towns & Villages.</p> <p>Q28. Please provide your comments for Policy HO3 and any suggested changes to the policy.</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Text for Representation</p> <p>The updates to the distribution of housing supply around the sub-areas are supported</p>
Policy HO4	HO4	155	Preferred Option:	DtC / Overall Comments

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Managing Housing Delivery			<p>Policy HO4: Phasing the Release of Housing Sites</p> <p>The Policy sets out how the Council will manage the delivery of the new homes required in the District. The policy has been updated to remove the section which refers to splitting the Plan period into 2 phases in favour of a focus on delivery and management of the supply to ensure infrastructure is provided.</p> <p>Q29. Please provide your comments for Policy HO4 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>Text for Representation</p> <p>No comment</p>
Policy HO5 Density of Housing Schemes	HO5	158	<p>Preferred Option:</p> <p>Policy HO5: Density of Housing Schemes</p> <p>This Policy sets the Councils minimum density requirement for housing developments. The minimum policy threshold has been raised and strengthened, since the adopted Core Strategy and more emphasis has now been placed on higher development requirements in areas which are well located to amenities and public transport connections</p> <p>Q30. Please provide your comments for Policy HO5 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC/Overall Comments</p> <p>This policy increases density the minimum baseline density of residential development schemes from 30 to 35 dwellings per hectare (dph). It also raises it further to 50 dph for those schemes well served by public transport.</p> <p>Text for Representation</p> <p>Support for changes.</p>
Policy HO6 Maximising the Use of Previously Developed Land	HO6	160	<p>Preferred Option:</p> <p>Policy HO6: Maximising the Use of Previously Developed Land</p> <p>This policy sets the Councils target for the proportion of new homes which will be built on sites which have been previously developed. There is no change from the District target of 50%, but the proportions for all but the regional city of Bradford tier of the settlement hierarchy have been revised to bring them in line with the housing land supply.</p> <p>Q31. Please provide your comments for Policy HO6 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>The percentage targets for different settlement typologies is amended</p> <ul style="list-style-type: none"> • Bradford city Stays at 55% • Principal towns From 50% to 35% • Local Growth Centres From 15% to 20% • Local Service Centres From 35% to 25% <p>Text for Representation</p> <p>No comment</p>
Policy HO8 Housing Mix	HO8	162	<p>Preferred Option:</p> <p>Policy HO8: Housing Mix</p> <p>Self-build and specialist accommodation needs criteria added to the policy.</p> <p>Q32. Please provide your comments for Policy H8 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Minor change to bring the Policy into line with national Policy. Minimal Impact.</p> <p>Text for Representation</p> <p>Support for changes.</p>
Policy HO9 Housing Quality	HO9	165	<p>Preferred Option:</p> <p>Policy HO9: Housing quality</p>	<p>DtC / Overall Comments</p>

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			<p>The Preferred Option makes reference to the updated housing need evidence and the Housing Design Guide SPD and identifies targets for optional technical standards required from new development consistent with the revised NPPF.</p> <p>Q33. Please provide your comments for Policy HO9 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>This Policy echoes Leeds new CSSR policies for requiring minimum space standards and on providing accessible housing for all users. With this in mind it should be supported to ensure all users in west Yorkshire have access to good quality accommodation.</p> <p>Text for Representation</p> <p>Support new policy requirements to improve the quality of accommodation and help ensure all households in West Yorkshire have access to accommodation that meets their needs.</p>
Policy HO11 Affordable Housing	HO11	169	<p>Preferred Option:</p> <p>Policy HO11: Affordable Housing</p> <p>The Preferred Option makes reference to the updated housing need evidence and identifies targets, thresholds and types of affordable housing required consistent with the revised NPPF.</p> <p>Q34. Please provide your comments for Policy HO11 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Brings the Policy into line with national Policy.</p> <p>This Policy echoes Leeds new CSSR policies on providing affordable to meet needs in the area..</p> <p>Text for Representation</p> <p>Support policy changes.</p>
Policy HO12 Sites for Travellers and Travelling Showpeople	HO12	172	<p>Preferred Option:</p> <p>Policy HO12: Sites for Travellers and Travelling Showpeople</p> <p>The Preferred Option makes reference to the updated need evidence and identifies targets for the identification of additional pitches to meet need over the plan period and identifies criteria for assessing sites and planning applications consistent with the revised NPPF and national planning policy for traveller sites.</p> <p>Q35. Please provide your comments for Policy HO12 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>The policy in structure is similar to the existing Core Strategy with further clarification about the conditions that need to be met such that allocation of G&T sites in the Green belt is supported (sub-paragraph F). However, the greatest single concern to Leeds is the reduction of the number of pitches</p> <ul style="list-style-type: none"> from 39 to 10 Gypsy and Traveller pitches, from 7 to 5 transit pitches and from 45 to 0 (zero) travelling showpeople pitches. <p>The supporting text states that this reduction is based on the changes to definitions in National Planning Policy for Traveller Sites (PPTS)(updated 2015) supported by an updated Gypsy and Traveller and Travelling Snowperson Accommodation Assessment undertaken as part of their SHMA (2019) (GTAA).</p> <p>Paragraph 5.46.2 of this text states:</p> <p>‘A major change in planning policy, introduced by PPTS 2015, was to amend the definition of both ‘Gypsy and Traveller’ and ‘Travelling Showperson’ to exclude, for planning purposes, anyone who has stopped travelling on a permanent basis. It continues to include those who have ceased to travel temporarily. This created a more restricted ‘PPTS 2015’ definition which applies to those who follow a nomadic habit of life. The GTAA evidence therefore expresses two levels of need for pitches: a ‘cultural’ and ‘PPTS’ need. This is to ensure that the overall needs of the Travelling community are fully reflected in the evidence base which needs to accord with planning and wider policies.’</p> <p>From a strategic perspective the requirement overall is substantially less than the previous GTTA, going from 39 pitches in 2015 to 10. Whilst there has been a change in definitions, Leeds would want to be satisfied that the evidence to support the reduction in pitch provision is fully robust. For example, the evidence provided by Arc 4 is the First Draft Report 2019, and sections on transit</p>

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				<p>provision are left blank, whilst the policy refers to 5 pitches for transit provision. Leeds would need to be satisfied that the reduced pitch provision in Bradford could would not-result in:</p> <ul style="list-style-type: none"> • A greater lack of choice for the Gypsy and Traveller and Travelling Showpeople communities • Potential greater stress levels placed on existing and proposed pitches in Leeds through the reduction of choice <p>The strategic nature of the above falls clearly under the remit of 'Duty to Cooperate'. It is therefore recommended that due representation is made to Bradford where the above is highlighted and which also includes a request for further discussion involving Gypsy and Traveller Exchange (GATE) to ensure that the housing needs of the community are met in both authorities cities.</p> <p>Text for Representation</p> <p>Leeds has concerns regarding the overall reduction of pitches recommended in this Policy. From a strategic perspective the requirement overall is substantially less than the previous GTTA, going from 39 pitches in 2015 to 10. Whilst there has been a change in definitions, Leeds would want to be satisfied that the evidence to support the reduction in pitch provision is fully robust. For example, the evidence provided by Arc 4 is the First Draft Report 2019, and sections on transit provision are left blank, whilst the policy refers to 5 pitches for transit provision. Leeds would need to be satisfied that the reduced pitch provision in Bradford would not-result in:</p> <ul style="list-style-type: none"> • A greater lack of choice for the Gypsy and Traveller and Travelling Showpeople communities • Potential greater stress levels placed on existing and proposed pitches in Leeds through the reduction of choice <p>The strategic nature of the above falls clearly under the remit of 'Duty to Cooperate'. It is therefore requested that further dialogue take place between Leeds and Bradford involving the Gypsy and Traveller Exchange (GATE) to ensure that the housing needs of the community are met in both cities.</p>
Policy EN2a Biodiversity and Geodiversity	EN2a	180	<p>Preferred Option:</p> <p>Policy EN2a: Biodiversity and Geodiversity</p> <p>This policy seeks to protect and enhance biodiversity and geodiversity within the District, setting out the hierarchy of protected sites and identifying principles for enhancing the overall biodiversity resource.</p> <p>This is a new policy which builds on the previous Policy EN2. The preferred option strengthens the hierarchical approach to the different nature conservation designations. It introduces a new level of designation – Local Wildlife Networks which allow for the migration, dispersal and genetic exchange of plants and animals. These networks will be protected from fragmentation. The policy also sets out how habitats and species of principal importance will be considered in the determination of planning applications.</p> <p>Q36. Please provide your comments for Policy EN2a and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>The climate emergencies declared by Leeds and Bradford support any Strategic and other policies that maintain and improve the overall aim of the emergency. With this in mind it is clear that the objectives of the Policy align with the direction taken by Leeds.</p> <p>As Bio-Diversity issues, by their very nature are cross boundary and strategic Leeds fully supports the changes to this Policy. This Policy supports the work currently being undertaken by Leeds to review our local wildlife sites and the identification of the Leeds Wildlife Habitat Network which connects directly across the boundary with Bradford.</p> <p>Text for Representation</p> <p>Support for policy changes.</p>
Policy EN2b	EN2b	185	Preferred Option:	DtC / Overall Comments

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Biodiversity and Development			<p>Policy EN2b: Biodiversity and Development</p> <p>The aim of this policy is to secure measurable net-gains in biodiversity value in all new development. This is a new policy which establishes the requirement for major developments to provide an ecological survey and a biodiversity net gain calculation using the DEFRA/Natural England biodiversity metric. Developments should demonstrate a 10% biodiversity net-gain and show how the on-going management of such measures will be secured. The policy also requires net-gains for minor developments and provides a list of possible biodiversity improvements which can be made. It also considers the impacts on social wellbeing of any biodiversity net-gains that are proposed.</p> <p>Q37. Please provide your comments for Policy EN2b and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>The climate emergencies declared by Leeds and Bradford support any Strategic and other policies that maintain and improve the overall aim of the emergency. With this in mind it is clear that the objectives of the Policy align with the direction taken by Leeds.</p> <p>The Policy proposes measurable net gain of 10% in in Bio-Diversity based on a national government standard as recently concluded from the national consultation.</p> <p>As Bio-Diversity issue by their very nature are cross boundary and strategic Leeds fully supports the changes to this Policy.</p> <p>Text for Representation</p> <p>Support for policy changes.</p>
Policy EN5 Trees and Woodland	EN5	188	<p>Preferred Option:</p> <p>Policy EN5: Trees and Woodland</p> <p>This policy looks at the protection and enhancement of trees and woodland together with the protection and provision of trees in new development. In particular it ensures the protection of ancient semi-natural woodland and veteran trees.</p> <p>The preferred option sees the policy updated to ensure that during the construction of new development appropriate buffer zones around existing trees are put in place to reduce the risk of damage. It also requires any trees lost to be replaced on a one for one basis and at a ratio of two for one where mature trees are lost. It also encourages the planting of new native tree species with a view to enhance biodiversity.</p> <p>Q38. Please provide your comments for Policy EN5 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Policy requirements to protect and enhance trees are proposed.</p> <p>Text for Representation</p> <p>Support for policy changes.</p>
Policy EN6 Energy	EN6	190	<p>Preferred Option:</p> <p>Policy EN6: Energy</p> <p>This policy looks to maximise improvements to energy efficiency and support the provision of decentralised and renewable energy in the District.</p> <p>The preferred option has seen some minor changes made to the policy wording to clarify the position with regards to the setting of local requirements for the sustainability of buildings.</p> <p>Q39. Please provide your comments for Policy EN6 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Minor changes to policy promoting use of renewable energy</p> <p>Text for Representation</p> <p>No Comment</p>
Policy EN7 Flood Risk	EN7	194	<p>Preferred Option:</p> <p>Policy EN7: Flood Risk</p>	<p>DtC/General Comments</p> <p>This changes to this policy clarifies Bradford's position that development should take place on areas that are least susceptible to flooding, and appropriate assessment and sequential tests to take place where necessary. The Policy also introduces greater specificity on mitigation to reduce overall risk.</p>

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			<p>This policy looks at how the Council will pro-actively manage flood risk across the district as part of new development and plan making.</p> <p>The preferred option has seen the policy strengthened to clarify the application of the sequential and exception tests, require planning applications to be supported by a site-specific flood risk assessment where applicable, introduces the drainage hierarchy and requires major developments to incorporate SuDS. It also clarifies the surface water run-off rates for both Brownfield and Greenfield development and supports proposals for natural flood risk management.</p> <p>Q40. Please provide your comments for Policy EN7 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>As the Aire and the Wharfe are both rivers that have an impact on Leeds any Policies that mitigate the risk of flood 'upstream' are to welcomed at a Strategic level.</p> <p>Response</p> <p>Support. Leeds would welcome on-going work with the EA and Bradford on planning for flood risk</p>
Policy EN8 Environmental Protection	EN8	199	<p>Preferred Option:</p> <p>Policy EN8: Environmental Protection</p> <p>The overall aim of the policy is to protect public health and the environment by ensuring that all forms of pollution are minimised and adequately mitigated as part of new developments.</p> <p>This policy has been amended to include additional details relating to the implementation of the Water Framework Directive. In particular it looks to support development which helps to achieve 'good' ecological status of surface and ground water bodies. It also looks to support the opening up of culverts to enhance the natural geomorphology of water courses as well as managing water demand and improving water efficiency in new developments.</p> <p>Q41. Please provide your comments for Policy EN8 and any suggested changes to the policy?</p> <p>If you would support an alternative to the preferred option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>The proposed changes to Policy EN8 support development that will improve ecology, watercourses and improve water efficiency</p> <p>Text for Representation</p> <p>No Comment</p>
Policy ID2 Viability	ID2	207	<p>Preferred Option:</p> <p>Policy ID2: Viability</p> <p>Policy ID2 will help to ensure the Local Plan is viable and deliverable by establishing the principles for considering financial viability through the plan making and development management processes. The Policy supports objectives 1, 2 and 5 of the Core Strategy</p> <p>The Preferred Option reflects recently updated national planning policy and guidance that places greater emphasis on establishing financial viability as part of the plan making process, and sets out the circumstances under which viability of development proposals will be considered at the planning application</p> <p>Q41 Do you agree with the preferred approach to viability?</p> <p>If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.</p>	<p>DtC / Overall Comments</p> <p>Policy on assessing viability of development is strengthened in line with new national planning policy.</p> <p>Text for Representation</p> <p>Support changes.</p>