

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.