

# Local Plan

## Frequently Asked Questions

### 1. What is a Local Plan?

The Local Plan guides how the communities and places across the District will develop over a 15-year period. It will tell us how many houses we need, how much employment land we need, how much infrastructure we need as well as indications for where it should go and how we can best protect our environment. When adopted it will guide decisions on whether or not planning applications should be granted and it will be the overarching framework for any Neighbourhood Plans. It will also inform the investment plans of Government and others including those who provide key infrastructure.

### 2. Why is the Council preparing a new Local Plan?

The Local Plan is a statutory requirement and the Government has made it clear that all local authorities must have an up-to-date plan and it must be pro-growth. The National Planning Policy Framework (NPPF) explains that 'The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings' (NPPF, p15).

### 3. What is the status of the existing Local Plan?

The current local plan is made up of a number of adopted planning documents:

- Core Strategy (adopted 2017) – Strategic and thematic policies
- Bradford City Centre Area Action Plan (adopted 2017) – Policies and allocations
- Shipley & Canal Road Corridor Area Action Plan (adopted 2017) – Policies and allocations
- Waste Management Development Plan Document (adopted 2017) –Policies
- Replacement Unitary Development Plan (RUDP) (adopted 2005) for designations and allocation outside of above document

These documents will remain the local planning policy until the new Bradford District Local Plan is at an advanced stage of preparation. When adopted following examination these documents will be replaced by the new local plan.

### 4. What would happen if we didn't produce a Local Plan?

The Local Plan is a statutory requirement and the Government has made it clear that all local authorities must have an up-to-date plan by 2023. Failure to do so could lead to intervention whereby the Government writes our Local Plan and policies. Without a new plan we could find ourselves unable to resist unacceptable development or refused applications being granted on appeal. This could result in unplanned development in unsustainable locations.

## **5. How can I make comments on the Local Plan?**

We welcome comments on the draft plan during the consultation period which runs from **Monday, 8<sup>th</sup> February to Wednesday 24<sup>th</sup> March 2021**. Comments are preferred to be submitted electronically using the dedicated online system ([OpusConsult](#)) which allows access to the information and make comments against specific sites or elements of the document.

We would encourage people who disagree with the proposals in the draft plan to provide reasons or evidence for their comments and suggest alternatives wherever possible.

Link to consultation: [Local Plan Consultation System \(OpusConsult\)](#)

Alternatively see the [Council's Corporate Consultation page](#) for further information.

## **6. What difference will my comments make and what will happen next?**

We will record and consider all the feedback we receive from this consultation from the public, stakeholders and statutory bodies. and what the evidence is showing us to write a draft local plan.

The draft local plan will then undergo further consultation in Winter 2021 before being submitted to the Planning Inspectorate (Spring 2022). At an 'Examination in Public' the plan will be assessed by an independent Planning Inspector (Summer/Autumn 2022). It is anticipated that the new Local Plan will be adopted in late 2022/early 2023.

## **7. Who decides if the Local Plan is acceptable?**

An independent Planning Inspector will examine the plan through a formal 'Examination in Public' to assess if it has been prepared in accordance with legal and procedural requirements and whether it is 'sound'. To be found 'sound'. The Local Plan must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Following the examination, the Inspector makes recommendations to the Secretary of State and the local planning authority about whether the local plan should be adopted, or any changes should be made. If changes are required further consultation is necessary. If the plan can be adopted, it would need to be formally decided by the council.

## **8. What is this consultation about?**

The consultation is seeking views on the draft local plan in particular the draft policies, as well as the site allocations and designations to guide and deliver development to 2038. The consultation sets out the options considered in particular the sites considered but not considered appropriate to allocate (not in right places, local impact/constraints, not deliverable within the plan period).

## **9. What Evidence do you have to support your approach and where can I find it?**

The consultation will be supported by a range of technical studies produce by the Council or specialist consultants. These uses clear and established methodology where appropriate so that the conclusions it reaches are transparent and meet Government requirements for Local Plans to be supported by a proportionate set of compliant evidence.

These evidence base documents help us to write policy from an informed perspective using a common approach but informed by local information, and are considered alongside other considerations like the results of consultations and national policy.

## **10. How do you assess the impacts of the local plan?**

A number of assessments which consider the options and impacts of the policies and allocations including how Sustainable they are (Sustainability Appraisal), impacts on health (Health Impact Assessment), and consideration of needs of different groups (Equalities Impact Assessment). These have been published alongside the consultation document.

## **11. Where have the housing numbers come from?**

The Council has used the nationally prescribe standard method for assessing local housing need which is set by Government and is the start point in setting the final housing requirement in the Local Plan. The current standard method for the District was issued by government in December 2020. It is set using the 2014 based national household projections with a minor adjustment for affordability. This provides a need starting figure of 1,704 per annum. In addition to this the Government requires the 20 biggest cities in England to then plan for a further 35% uplift to be delivered within the main city focusing on brownfield land.

The Draft Local Plan sets out allocations to meet 1,704 per annum. The evidence at present does not show that there is a supply of deliverable non-green belt land to meet the 35% uplift within the City of Bradford.

## **12. Why can't we build on brownfield sites instead of greenfield ones?**

The Council has undertaken significant work to assess the land available through several call for sites and urban studies. This resulted in over 1,500 sites being assessed. While the plan seeks to prioritise the use of brownfield land the nature of the land supply in terms of how much, where it is and constraints to development mean the plan cannot meet the needs by brownfield alone.

The District has been successful over the past 10 years with delivering housing on brown field sites with over 70% of the annual total housing taking place on brownfield land year on year.

The Draft plan sets a target of 50% of housing to be from brownfield land. This will be higher within the main urban areas and lower in some settlements due to supply of land.

## **13. How have you chosen these sites for new housing and employment?**

The Council has used a thorough process to identify the proposed housing and employment land allocations set out in the draft Local Plan. The Council has considered over 1,500 sites which came from survey work as wells as suggestions from call for sites from communities and land owners. These have been reduced down having regard to the sustainable distribution of development and also detailed site assessments including whether sites can be delivered within

the plan period. Further details can be found in the Sustainability Appraisal Report that forms part of the consultation.

#### **14. How is the climate change emergency being considered and addressed?**

The new local plan has a key role in tackling and mitigating the climate emergency by supporting a transition to net zero carbon. New growth comes with demand for materials, heat, electricity and transport, it is typically associated with growth in carbon emissions. The amount of emissions depends on:

- where it is built,
- provisions for sustainable travel,
- the quality of buildings (building construction /materials and energy use when occupied), and
- how much renewable energy is deployed alongside new growth.

The Local Plan seeks to mitigate climate change through:

- Building standards
- Focusing scale and distribution of new development within existing urban areas close to other services and close to existing sustainable travel options or where investment can be made to mitigate.
- Support renewable energy network
- Support carbon capture through green infrastructure protection and enhancement

These elements are embedded within the policies and through the processes of assessing the options for the plan.

Further work will be undertaken prior to the finalisation of the plan to assess the carbon impact of the local plan proposals

#### **15. How will local services and infrastructure cope with more growth?**

The Local Plan considers the impact of the growth on infrastructure and works with providers to inform their investment plans. The Council have produced a Local Infrastructure Plan (LIP) which sets out across a range of types of infrastructure the current level of provision, known improvements as well as impact of the Local Plan proposals. This is a live document which is regularly updated.

When large-scale developments are given planning permission, developers are asked to either provide or make contributions towards local infrastructure and services. These could include new or improved roads, open spaces, community facilities or schools. Often developers make financial contributions towards local health services, open space and education. These provisions or contributions are set out in Community Infrastructure levy (CIL) Charging Schedule and also Section 106 legal agreements. The Council produced an annual Infrastructure Funding Statement (IFS) in December 2020 which sets out more information on current contributions and what they will be spent upon.

#### **16. Won't building more houses increase the risk of flooding?**

There are many reasons for flooding, including extreme weather, but the planning system is designed to address the risk of flooding in the following ways:

- There are very strict rules and laws in place within the planning system to ensure all new developments do not cause flooding problems and if anything, lower the risk of flooding  
For example, all new developments on greenfield sites are designed to ensure surface water run-off is the same or lower than the current land use
- On brownfield sites, new development and modern design will seek to lower flood risk

The Local Plan is also supported by a Strategic Flood Risk Assessment which sets out the types of flooding locally and assessment of the plans proposals to ensure sites themselves avoid areas within areas of high probability of risk. Work continues with the Environment Agency to make sure the Local Plan is informed by the most up to date information on flood risk.

### **17. Have you considered the impact on your adjoining Local Authority Area?**

The Council works with other local authorities in considering the cross boundary impacts of their plans. There is a long established record of working within Leeds City Region (LCR) with a number of regular officer and member forums to consider these matters. In line with Government requirements the LCR has produce and agreed a Statement of Common Ground (March 2020) which sets out the consideration of strategic planning issues. This will be updated as local plans develop and circumstances need updating. The consultation is supported by a statement setting out the strategic matters relevant to this Local Plan. This informs further work prior to submission to ensure impacts are understood and mitigated where possible. The consultation is supported by an initial statement on the work to date and process going forward.

8<sup>th</sup> February 2021