STATEMENT BY ROBERT FELSTEAD
District of Bradford, West Yorkshire
Population, employment, Core Strategy and NPPF

I, Robert Felstead, have lived in Burley In Wharfedale for 15 years. I hold a BSc (Mathematics) and I'm a Prince II practitioner and IT professional.

I'm not appearing as an expert in the field of development but wish to speak at the inquiry to be held in May this year (2019). I will be predominantly focussed on population growth and employment opportunities within the Bradford District, both of which relate to the Core Strategy, policy EC1 and the NPPF's presumption in favour of sustainable development.

A. Appellant's statement of case.

The appellant has set out its case to the Planning Inspector and several points made need to be addressed and clarified.

Ref. Appendix 1 - Appellant's statement of case. The quotes in blue, which follow, are direct extracts from this document.

A.1 Sun Lane Development

The appellant's statement of case refers to the proposed development, within section 2.0 of their document:

❝ 2.0 The proposed development.

2.2 Burley-in-Wharfedale is also well served by a range of means of transport,…

Burley-in-Wharfedale also benefits from being served by a range of bus services providing regular services to Leeds, Otley and Ilkley.

Section 2.2, above, in the appellant's statement, is not wholly indicative of the transport situation.

Trains – travelling on the Airedale line. It must be noted that the section of line from **Guiseley** to **Shipley** (which is where the Wharfedale line links into the Airedale line) is a single-track line, and that therefore there are issues that affect the frequency of rail transport to and from Bradford.

The **X84** bus, which travels from Ilkley to Leeds. The average journey time advertised is 1 hour and 5 minutes. There is <u>no mention</u> of direct bus transport routes into Bradford, since none exist. It's important to remember that Sun Lane is

supposed to satisfy a housing and employment need for the Bradford District, not Leeds. Therefore, services into Leeds district are less relevant to this application.

A.2 Core strategy

❝ *3.4 The Statutory development plan comprises:*

> • *the Bradford Local Plan Core Strategy 2013-2030 ("Core Strategy") – recently adopted on 18th July 2017*

The appellant's case, in sections 3.4 and 3.5 of their document, also refers to the Council's Core Strategy.

Section 3.4 of the case **–** Planning policy, or the 'Core Strategy', as detailed by the appellant, runs from 2015 to 2030 and not 2013 to 2030 as they would suggest.

❝ *3.5 In respect of the Core Strategy, prior to its adoption it was the subject of considerable scrutiny. It was the subject of two periods of public examination in March 2015 and May 2016, where matters relating to the exceptional circumstances for removing land from the Green Belt, both across the District and within Burley-in-Wharfedale specifically, were considered in detail and found to exist. In order for the plan to be found sound, the Inspector required the apportionment of homes to Burley-in-Wharfedale to be increased to 700, which necessarily entails the development of the Application site and was based on its availability, along with the Planning Application site's ability to deliver new community facilities including a new school alongside new housing. The release of the Application site is therefore an inherent part of the recently adopted and fully examined Core Strategy. The existence of exceptional circumstances, the apportionment for Burley-in-Wharfedale and consequential need to release land from the Green Belt was fully examined by the Inspector who made the appropriate recommendation for the adoption of the Core Strategy with the necessary modifications.*

Section 3.5 of the case - It should be noted that, although subject to scrutiny, in May 2016 Bradford Council, crucially, did not have an up-to-date register of Brownfield sites. Nor had they closely examined employment or population statistics available to them at the time, including those from the Office for National Statistics (ONS). The purpose and importance of such an examination will become clear later.

A.3 Sty Lane, Micklethwaite

Within the following, the appellant seeks justification for the Sun Lane development based upon a previously determined green belt application.

❝ *4.18 The Applicant will also demonstrate that CBMDC is not able to demonstrate a 5-year housing land supply. This is acknowledged by CBMDC and confirmed in the officer's report on the Planning Application. This position has also been accepted by the Secretary of State in the consideration of other planning applications for housing in the Bradford District. On 22nd September 2016, in*

*approving a planning application for up to 440 dwellings on land at Sty Lane, Micklethwaite2, the Secretary of State concluded that "**the district does not have a 5-year supply of specific deliverable sites to meet housing requirements – it is at best about 2.05-years – the Secretary of State agrees that the contribution that this development would make to addressing the acute shortage of housing is a benefit that should attract very substantial weight in the planning balance; and that the provision of affordable housing at 20% is also a significant factor."*

4.20 In light of the pressing need for new housing the Applicant will demonstrate how the development of 500 new homes on the land to the west of Burley-in-Wharfedale will play a significant role in contributing towards boosting housing supply and alleviating the current 5-year supply deficiencies.

With reference to the planning applications mentioned in point **4.18 and 4.20 respectively** there are some points to note, below.

1. The land at Sty Lane, Micklethwaite, which can accommodate 440 homes, <u>remains undeveloped at this date.</u> There are currently no planning applications for the land at Sty Lane, Micklethwaite.
2. The appellant's (ceg's) application for Sun Lane was submitted on the 27th September 2016, 5 days after the planning inspector's approval to build at Sty Lane, Micklethwaite.

   If speed of build is of the essence, as Council and ceg: suggest in point **4.20** above, why haven't ceg: applied to build on the land at Micklethwaite? This would have addressed the perceived '**current 5-year supply deficiencies**' in housing which ceg: have made in their statement, point 4.18.

   Furthermore, why did Council not draw to ceg:'s attention that the land at Micklethwaite was available to commence building, at the time of their application to build at Sun Lane? Such a move would have eased the perceived '**5-year supply deficiencies**' in housing supply throughout the district.

   The fact that Sty Lane, Micklethwaite remains undeveloped, appears to undermine both Council and ceg:'s conclusion that Green Belt release is required in the Bradford district.

3. Interestingly, the appellant objected to and challenged by judicial review a planning application at Greenholme Mills, Burley In Wharfedale (for 92 homes, predominantly starter home apartments) on 3 separate occasions because it included "1,400m2 greenfield area outside of the established curtilage of Greenholme Mills." **This delayed building by no less than 15 months.** This is to be addressed in detail by another speaker.

4. Lastly, the inspector granted permission to build at Sty Lane, Micklethwaite, based on circumstances that existed at that time. We are now 18 months down the line and circumstances will have changed.

3

A.4 The school travel plan.

> *4.43 The Travel Plan will contain initiatives aimed at maximising walking, cycling and public transport access to the site, and minimising car borne travel. **The Primary School on the site will be within easy walking distance**, and a specific School Travel Plan will be developed to reinforce to pupils and their parents the benefits of walking to school."*

4.43 – The inclusion of point 4.43 is pure conjecture on the part of the appellant, the proposed school on the Sun Lane site is not being delivered by either the appellant or Council. The application and plans to build a school have not been submitted by either party as part of the building application.

Extract sources – ceg: Statement of case, appendix1

B. Bradford's Core Strategy.

The Core Strategy sets out the broad aims and objectives for sustainable development within the district for the next 15 years, 2015 – 2030.

The appellant's application falls within this period and the appellant consistently refers to how its proposal aligns with Bradford's Core Strategy, indeed this is the basis of their application, alongside 'very special circumstances.'

There's one issue which however, I cannot reconcile and that's the date of the application, September 28th, 2016. At that time, the Core Strategy was not only still emerging, but also not ratified or adopted by council.

The Core Strategy was adopted on 18th of July 2017, almost a year after ceg's proposal. To suggest at this early stage that any proposal aligned with an unadopted and a work-in-progress Core Strategy is moot.

B.1 Objectivity and focus.

I attended 2 Regulatory and Appeals hearings at City Hall regarding Sun Lane, along with several other members of the community. Two points were consistently raised:

- The development should be for people who work within the Bradford district.

  Councillor Alan Wainwright made this fact abundantly clear at the January 2018 Regulatory and Appeals hearing. He specifically asked the appellant about transport connections from Burley In Wharfedale into Bradford (not Leeds). In his own words, "*this is the district in which the housing is to be built.*"

  Neither ceg:, or its transport consultant, could provide an answer about the transport connections from Burley to Bradford (ceg: and its consultants only

knew about/considered Leeds); however, a Bradford Council planning officer assisted ceg: by stating that *'trains ran from Burley to Shipley,'* and further that *'a train ran from Shipley to Forster Square.'*

- The second issue raised was the new school, the very essence at the time for '**very special circumstances'** to exist. As we now know, the school is not to be delivered by this planning application.

What appears to be coming into sharp focus is that, throughout the planning process, there has been a lack of attention to detail and impartiality by council. This has led to a planning application not only getting off the starting block, but to approval by council. This is precisely what I seek to reveal in the context of this planning application.

B.2 Core Strategy Policies EC1 and the NPPF.

Ref. Appendix 2 – NPPF, presumption in favour of sustainable development, page 6

The following in an exact extract from the NPPF.

" ***The presumption in favour of sustainable development***

11. Plans and decisions should apply a presumption in favour of sustainable development.

*For **plan-making** this means that:*

*a) plans should positively seek opportunities to meet the development needs of **their area**, and be sufficiently flexible to adapt to rapid change;*
b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas[5], unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area[6]; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
*For **decision-taking** this means:*
c) approving development proposals that accord with an up-to-date development plan without delay; or
d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date[7], granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed[6]; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5 As established through statements of common ground (see paragraph 27).

6 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.

7 This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1.

Extract source – NPPF, appendix 2

Ref. Appendix 3 - Policy EC1, section 5.1.6 of the Core Strategy.

" *Policy EC1 is very much an overarching policy that brings together the various mechanisms which will lead to the creation of a competitive local economy for Bradford as part of the Leeds City Region. This policy along with the subsequent policies relating to Economy and Jobs is underpinned by a range of strategies and evidence including the Regional Economic Strategy 2006-2015, Bradford Local Economic Assessment, Understanding Bradford District Report, Bradford District Employment Land Review and Bradford District Retail and Leisure Study.*"

Extract source – BDMC website, Cores Strategy, appendix 3

There has been no objective assessment of 11 b) of the NPPF (appendix 2) or policy EC1 (appendix 3) of the Core Strategy.

If Bradford council had objectively assessed the information at hand, they would have quickly established that the employment and population projections they have used are inaccurate. Furthermore, if Bradford had had a dialogue with the adjacent authority in Leeds, then they could have quickly established that Leeds were satisfying their own population and employment needs, in the context of housing supply.

A substantial proportion of the Leeds housing requirement is being delivered by the Leeds authority through building several thousand homes along the A65 and A650 corridors.

Bradford should focus on population, employment needs and opportunities within the Bradford district, and not the adjacent district.

B.3 Socio-Economic forecast.

During the planning period 2006 to 2015 and beyond, the Socio-Economic outlook for the Bradford district painted a very gloomy picture, which was, and still is at odds with policy EC1.

Throughout the period 2005 to 2015, Bradford's total workforce was in decline, according to the appellant's submitted statistical information.

Ref. Appendix 4, Socio Economic study.

Table D1.3   Changes in Total Workforce Jobs, 2005 - 2015

Area	2005	2015	Change (2005 - 2015)	
			Total	**%**
Bradford	220,290	218,650	- 1,640	- 0.7%
Leeds	466,210	480,810	14,600	3.1%
Yorkshire & The Humber	2,545,330	2,607,210	61,880	2.4%
United Kingdom	31,348,500	33,783,970	2,435,470	7.8%

Source: Experian December 2015

Extract source, APP_D1_SOCIO-ECONOMIC_APPENDICES-4653371.pdf

Throughout Yorkshire and the Humber Region, jobs were being created in all but the Bradford District, which saw a decline in employment of **(0.7%),** compared to a regional increase of 2.4% and a national increase of 8.4% according to the NOMIS report in appendix 11.

We have seen a further decline in employment across the Bradford district since that time. **At October 2018, employment levels had dropped again, to 217,000** (NOMIS report appendix 11)**, from the appellant's previously stated low of 218,650 in 2015.**

Data source – Appendix 11, NOMIS employment data - Bradford_employment.xlsx

Within Bradford's Core Strategy, and set against this backdrop, we see that Bradford Council forecast the creation of **1,600** jobs annually. This conflicts with data collated by Bradford Council and with appellant's submitted statistical evidence, as well as the latest NOMIS data (appendix 11).

The appellant's application submission (see next page) refers to in **Section 7**, that **iv Socio-economic activity** will be supported by documents and technical assessments. Clearly, however, it is not.

Appendix 5 - APP_A1_APPLICATION_SUBMISSION-4653343.pdf

"With reference to CBMDC's Validation Checklist Requirements (January 2016)
we anticipate that the outline application will be supported by the following
documents and technical assessments:
7 Environmental Statement, including:
  i Introduction to the ES;
  ii Details of the development proposals, including construction
  details, and site policy context,;
  iii Land use, including agricultural land;
  iv Socio-economic;

Extract source – Appendix 5, APP_A1_APPLICATION_SUBMISSION-4653343.pdf

Based on NOMIS statistical evidence in appendix 11, the figures provided by ceg: (Experian) within appendix 4 are inaccurate and cannot be used to justify a large demand for housing.

C. Population Growth across the district.

Between 2005 to 2015, Bradford District's population grew by an estimated 39,800 people, that's a mean average of 3,980 people per year. The period between 2005 and 2014, according to Bradford's own internal reporting, was showing a slow-down in the population growth rate.

Appendix 6 - Source population-update-2016.pdf
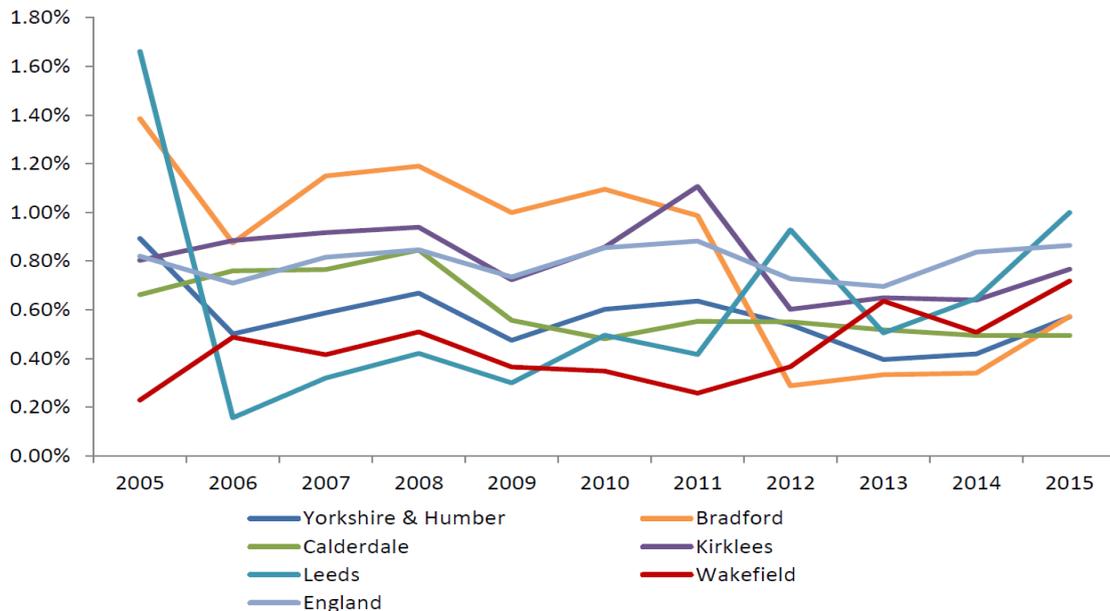

Population percentage increase 2005 - 2015

Chart source – BDMC website appendix 6

C:\Users\Bob Felstead\Desktop\APPW4705V183208020 Inquiry\MY notes\Employment_population_green_belt.docx

It's further noted that in July 2017, using population projections to 2026, as supplied by ONS, that the total population of the Bradford district is expected to increase by nearly 23,300 (4.3%); which is considerably lower than previous projections suggest. The working age population is anticipated to increase by just under 2% (6,300 people) during the planning period.

Appendix 7 - bradford-in-figures-july-2017.pdf

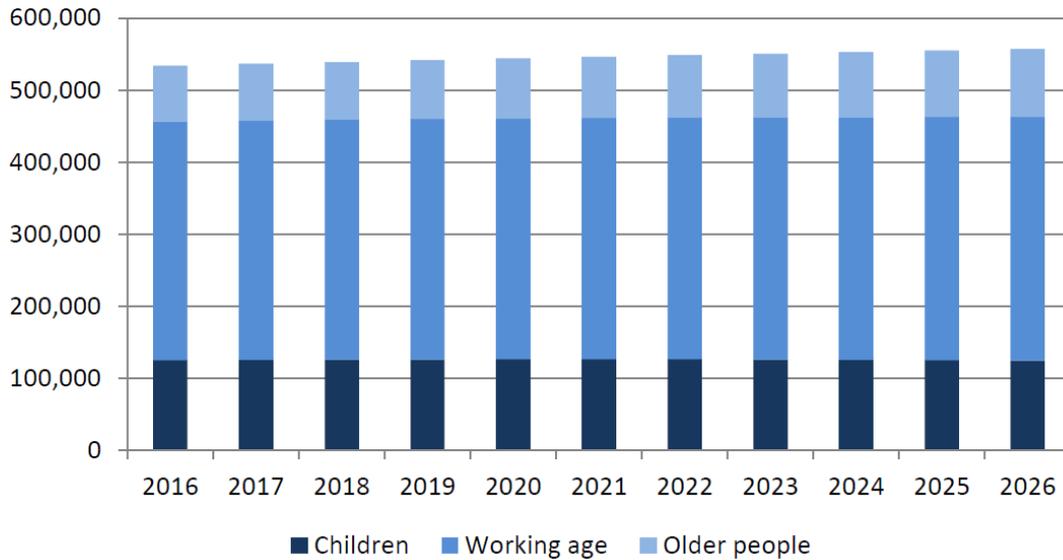**Bradford District Population Projections 2016 - 2026**
Source: ONS

Chart source – BDMC website, appendix 7

In the chart above (Bradford District Population Projections 2016-2026), the most striking increase is in the population aged 65 and older, which is expected to increase by more than 22% (17,000) – this group includes people born in the post Second World War population boom, and who are presumably already housed in the district?

The main drivers of population for the district from 2005 to 2017 are recorded as International migration.

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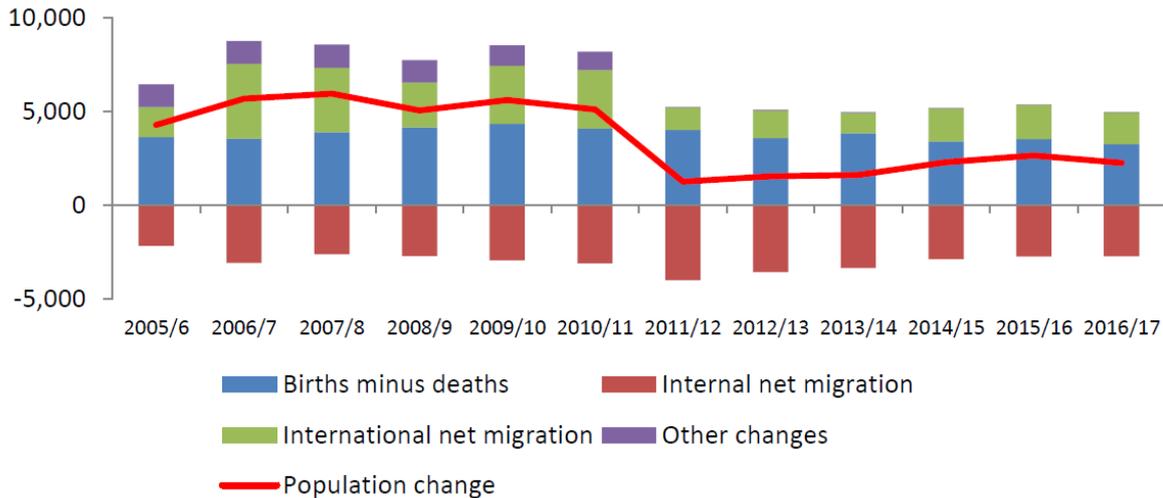**Main drivers of population change for Bradford District 2005/6 to 2016/17**

Chart source – BDMC website, appendix 7

Appendix 8 - population-update-2018.pdf

Bradford Council clearly state in the above report that:

> *Opening up the labour market to EU Accession states in 2004 led to a large influx of economic migrants who overtook the number of migrants from India. Within the last year the number of applications from European migrants has decreased. The number of applications from Polish nationals has decreased by more than one-third and the applications from Romanian nationals has decreased by more than 30%. Migrants from Pakistan still comprise the largest number of applicants for NINOs in Bradford.*

Extract source – BDMC website, appendix 8

(NINO = National Insurance Number application.)

B.4 Conclusion.

Considering the above, we must question the competence and credibility of Bradford Council's Core Strategy, since it appears that assumed population growth is incorrect and not supported by either NOMIS or Council's own data sets.

D. Employment and job creation.

Employment statistics were first introduced in Section B of this document, table D1.3, changes in total workforce jobs 2005 – 2015 and from **Appendix 3** - Policy EC1, section 5.1.6 of the Core Strategy.

Appendix 3 - Job creation in the district - The Council's position.

Policy EC1 states:

*"**C.**The Council's priority for **Grade A office developments will be Bradford City Centre** in line with its priority for regeneration of the city centre and the creation of a revitalised central business district.*

*D. Improved links between job opportunities, skills development and needs, business productivity and investment, and the needs of **excluded communities within Bradford District.***

E. A modern manufacturing sector and modernisation of manufacturing industries within the City of Bradford and the Airedale Corridor.

F. A knowledge-driven economy, by supporting the potential of the University of Bradford, Bradford College, further and higher education institutions, hospitals and research institutions and other knowledge-intensive industries including the tourism and cultural sector and links with the provision of incubator units and innovation units within Bradford City Centre and the Airedale Corridor.

Extract source – BDMC website, Core Strategy, appendix 3

## **D.1** Examination of policy EC1 and the NPPF

The creation of jobs goes hand in hand with housing; that is, housing supply is driven by a demand for employment within the district, as shown above in the NPPF - The presumption in favour of sustainable development at point 11 in Appendix 2. However, we appear to be building housing on Green Belt ahead of job creation (and ahead of identifying Brown Field sites) and during a period in which employment across the Bradford district is still in decline. **So where precisely are the Council's and appellant's objectively assessed needs, that are demanded by the NPPF?** The Council's and appellant's own data suggests that employment across the district is in decline and population growth is projected to be modest, at best. See Appendix 4 and Appendix 7 respectively.

D.2 NOMIS Employment statistical evidence and employment the within Bradford district.

(See the following chart. **Appendix 9** – Consolidated_data.xlsx)

*Data source – Appendix 4, (ceg:) Experian data. 2015 values – source(s) – 218,650 (ceg:) Experian data, 223,000 NOMIS data set. See Appendix 9 – **Consolidated data.xlsx***

(NOMIS is the official source of labour statistics.)

C:\Users\Bob Felstead\Desktop\APPW4705V183208020 Inquiry\MY notes\Employment_population_green_belt.docx
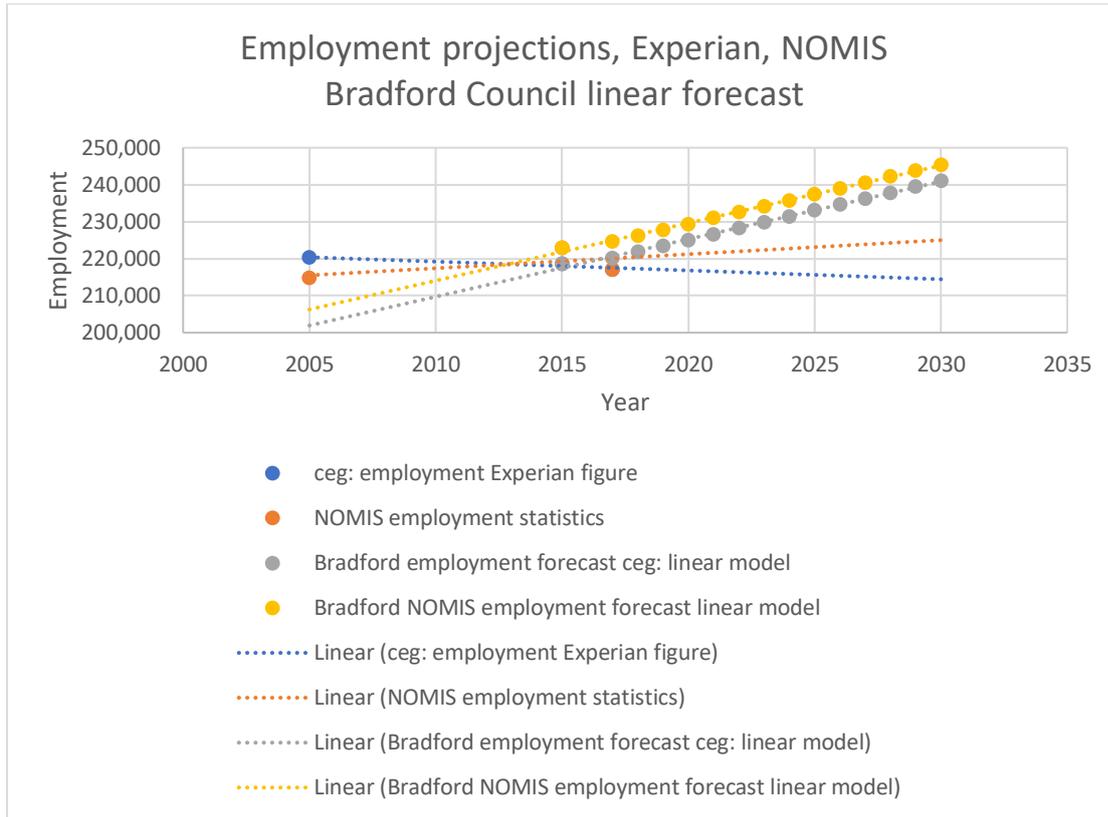
The relationships shown in the above chart are created from:
- the Experian employment data provide by ceg: (Appendix 4), which goes up to 2015,
- NOMIS figures (Appendix 11), which go up to 2018
- plus the annual jobs created according to Bradford's Core Strategy.

The actual employment figure for the year 2005 as quoted by NOMIS is 214,900. The appellant quotes an Experian figure of 220,290 (as also mentioned in section **B.3** of this document). In 2015 (the latest period we have for ceg Experian data) we have a NOMIS figure of 223,600, versus Experian at 218,650. These figures are markedly different. Importantly, the current NOMIS 2018 figure is 217,000; this is a drop from 2017 and the lowest figure since 2006 (NOMIS data does not provide a detailed explanation of changes).

The above is a simple chart which I have created from supplied data that illustrates actual employment data versus the Core Strategy prediction.
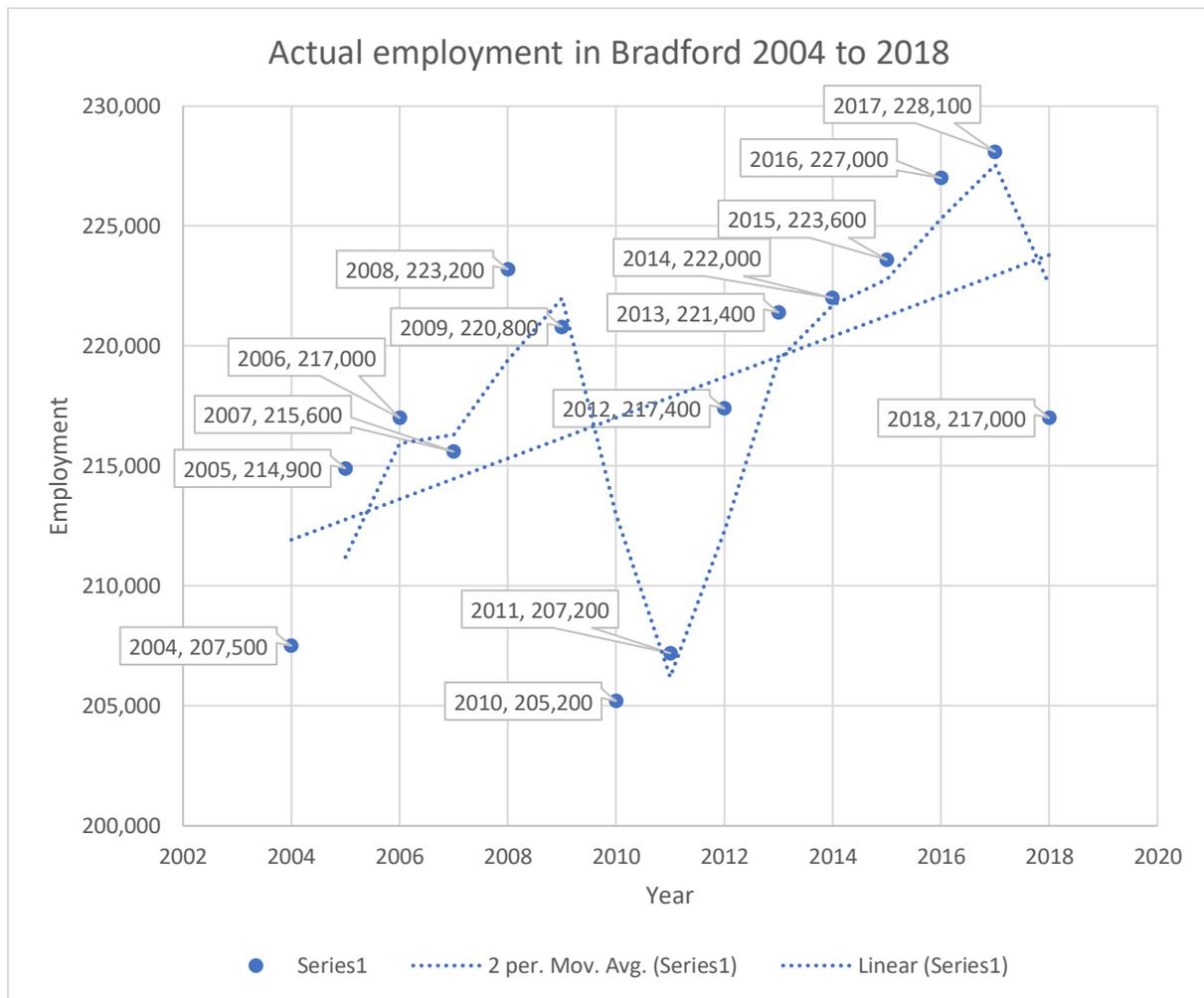
Average employment across the recorded period 2005 to 2018 stands at 217,860. Whilst the increase in employment over the same period is 2,100, or a mean average of **162** jobs per annum. Bradford Council have forecast a figure which is **10 times the mean** annual increase over the previous 13 years.

There's no correlation within the data sets supplied by NOMIS that would justify the linearity (a significant upward trend) in the creation of employment opportunities within the Bradford district as predicted by the Core Strategy.

I'm at a loss to understand how an employment projection that would yield the creation of 1,600 jobs per annum (as stated in the Core Strategy) has been derived. Such a significant increase in the annual job numbers would require a radical change in local employment, which is not backed up by any evidence or sound plans. Where is the substance, rigour and objectivity in the Core Strategy figures?

Here are the actual statistics as supplied by NOMIS, presented on a simple chart.

Appendix10 – Bradford_employment.xlsx, Leeds_employment.xlsx, and Braford_employment_forecast.xlsx

Actual employment in Bradford 2004 to 2018

Data labels shown on chart:
- 2017, 228,100
- 2016, 227,000
- 2015, 223,600
- 2014, 222,000
- 2013, 221,400
- 2008, 223,200
- 2009, 220,800
- 2006, 217,000
- 2007, 215,600
- 2012, 217,400
- 2018, 217,000
- 2005, 214,900
- 2011, 207,200
- 2004, 207,500
- 2010, 205,200

Legend: Series1 · 2 per. Mov. Avg. (Series1) · Linear (Series1)

Data source – Appendix 10, NOMIS employment data - Bradford_employment.xlsx

Note: the "2 per. Mov. Avg." is a 2 year moving average figure.
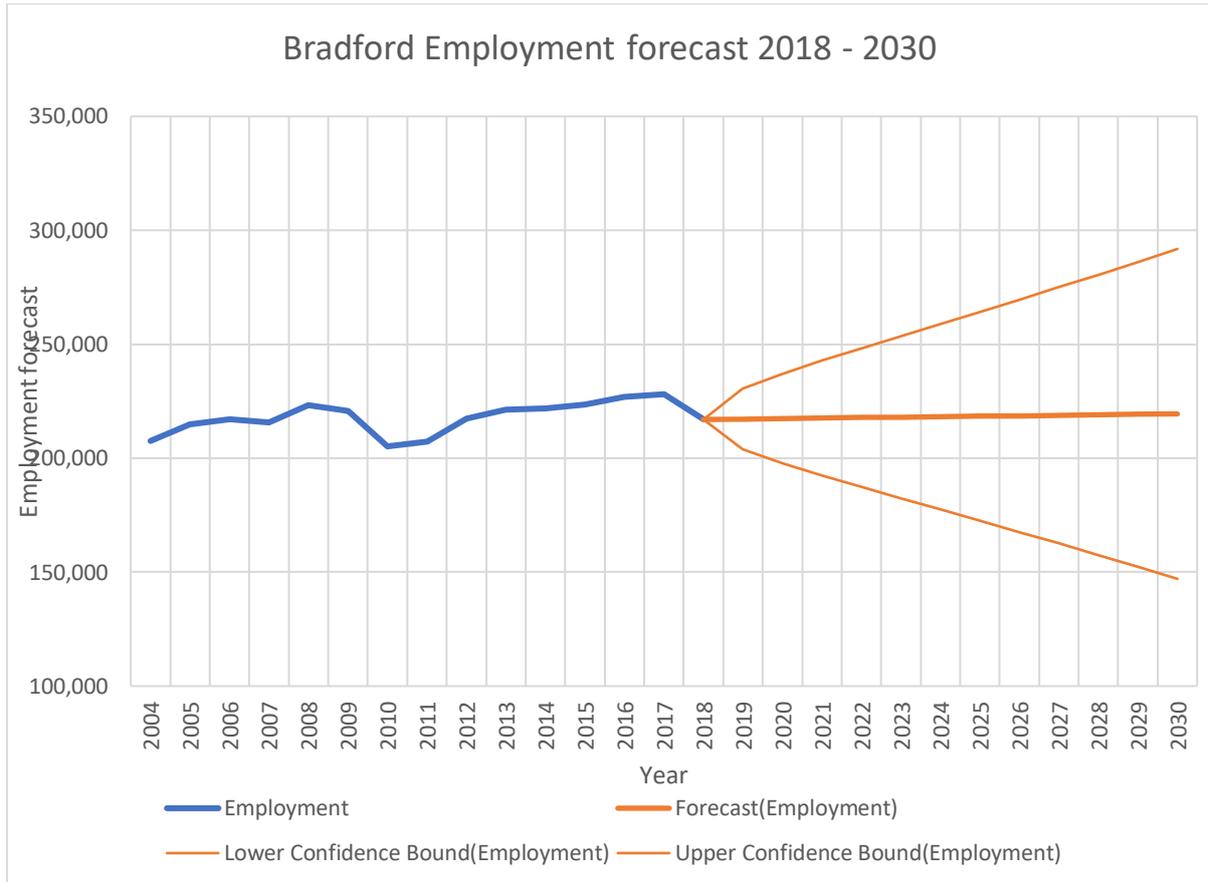
Data source – Appendix 10, NOMIS employment data - Bradford_employment_forecast.xlsx

The forecast predicts future values using your

existing time-based data and the AAA version of the Exponential Smoothing (ETS) algorithm.

According to statistical projections, the employment total at the end of 2030 based on the data supplied by NOMIS is 219,450, an increase of only 2,450 on 2018 employment figure.

The lower confidence bound for employment is 147,072 and the upper confidence bound is 291,829.

D.3 NOMIS Employment statistical evidence and employment the within Leeds district.

The adjacent authority of Leeds has a completely different data set which reveals a growing economy overall and creates an average of **3,330** jobs per annum.

Housing for population and employment growth in and around Leeds is being catered for by Leeds City Council. Ceg: are aware of the opportunities within Leeds district and are currently due to deliver over 1,000 homes over the next few years at Kirkstall Forge to support this growth.

Data source – Appendix 10, NOMIS employment data - Leeds_employment.xlsx

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D.4 Jobs and job opportunities, policy EC1 part C

As we have seen, Bradford district has struggled to achieve significant employment growth.

Many job opportunities have been lost to adjacent authorities, and this has all been based on skills shortage, in addition to a lack of infrastructure.

Job creation since 2005, policy EC1 part C

PWC have recently announced that they are to create 225 jobs in Bradford, in part of the old TJ Hughes building, which is very good news indeed, particularly as we're currently a minimum **4,800** jobs adrift** of employment figures as predicted in 2018 by the Core Strategy. (The actual value varies according to which data source you use for the 2015 employment figures.)
[based on a starting figure in 2015 of 218,650 (Experian – ceg: **Appendix 4) or (223,600 NOMIS)] and the current employment figure of 217,000 in September 2018 (NOMIS, **Appendix 10**)*

There have been a handful of jobs created in Ilkley (Principal Town) during the period 2016 to 2019 and, where there has been some job creation, they have almost exclusively been Retail and Nursing staff; hardly the well-paid opportunities required for house purchase in Wharfedale. (See section F of this document for details of average house prices and affordable homes.)

Job losses, policy EC1 part C

Over the last decade or so, Bradford has lost some (or part) of its significant employers.

HMRC is to close its operation at Forster Square in 2021, moving offices to Wellington Place in Leeds. HMRC has also recently confirmed that they are to close another 2 offices in Bradford in 2019.

Bradford & Bingley plc (the former building society which employed 2,862 in 2007, and more in its subsidiaries, many of whom were based in the Bradford district) closed - losing significant head count between September 2008 and 2009. The remaining entity, UKAR, in Crossflatts is on a wind-down programme of its loan book (see below).

Since 2010, Yorkshire Building Society (Bradford based) has relocated many of its senior managerial and specialist roles (e.g. marketing, finance/risk) from Bradford to central Leeds, where it is easier to attract the relevant skillsets.

Looking forward, policy EC1 part E – Appendix 11

As mentioned, UKAR (which has some of the mortgage and pension liabilities of the old Bradford & Bingley and Northern Rock plcs), based in Crossflatts, is reviewing its operations, as mortgage and pension books are all reducing in number. This will have an impact on existing employment at UKAR according to the chief executive.

"*The total number of customers continues to fall in line with our objective to reduce our Balance Sheet through 7,000 customers redeeming their loans and asset sales (40,000 customers). In total we have 84,000 customers (March 2018: 131,000), with 86,000 mortgage accounts (March 2018: 141,000) and 27,000 unsecured personal loan accounts (March 2018: 30,000). Most of these loans continue to perform well with more than 91% of mortgage customers up to date with their monthly payments.*

Source http://www.ukar.co.uk/media-centre/press-releases/2018/29-11-2018?page=1, Appendix 11

Damart who are a large employer within the Bradford district, whilst remaining profitable, operation profits are down, and the directors do not propose payment of a final dividend. This is quite significant as Damart serve a growing UK sector, those people aged 65 and over, so are they the next employer that could potentially see a fall in head count?

Unfortunately, at this stage, I have not managed to arrange a meeting with Andy Hill to discuss the matter further, nor would I expect him to elaborate on the current situation.

D.5 Conclusion.

Here again the outcomes of Bradford Council's Core Strategy, lacks credibility. The data at hand paints a different picture to what Bradford Council would have us believe. It's abundantly clear from the statistical evidence that the employment forecast is out of kilter with the true reality of the situation. The NOMIS data once more highlights the issue.

E. Unemployment.

In real terms, the increase in the unemployment claimant count (see the following chart) illustrates that Bradford has a consistently high unemployment rate that's far above the national, Yorkshire and Humberside average.

Appendix 12 - january-2019-unemployment-bulletin.pdf
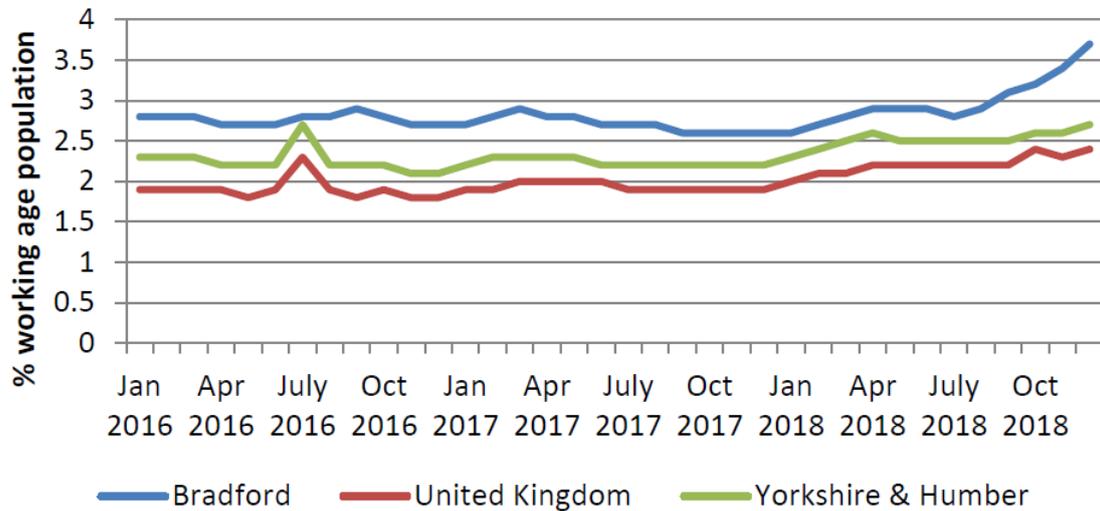
Chart source – BDMC website, appendix 12

The increase in Bradford unemployment above, ties in with the fall in employment reported in the NOMIS data we looked at earlier.

E.1 Conclusion.

The rise in unemployment across the district reinforces the fact that Bradford's Core Strategy employment forecast cannot be correct. Once again, the competence and credibility of the data in the Core Strategy is questionable and is substantiated by Bradford Council's own unemployment report.

F. Housing numbers proposed in Wharfedale.

Within Wharfedale, 2,400 homes are planned to be built to accord with numbers in the Core Strategy. Presumably therefore, a minimum of 4,000[†] new employment opportunities need to be created quickly within the Bradford district, locally or in the nearby Principal Town of Ilkley, which Wharfedale *(Menston, Burley In Wharfedale, Ilkley, Addingham)* are supposed to feed into. As we have already seen, there is no evidence of significant job creation happening.

[†] *Erring on the side of caution, I've conservatively assumed that 1 2/3 people per home are in full time employment in the Wharfedale area. (Menston, Burley In Wharfedale, Ilkley, Addingham)*

The Core strategy does call for employment land within Wharfedale, and only 5 hectares have been documented within the Core Strategy. There is no mention of where this land will come from within the Core Strategy review. However, as Burley is designated as a Local Growth Centre that serves the Principal Town of Ilkley,

presumably this land lies within Ilkley or in Wharfedale. Ordinarily, industry relies on excellent transport and communication hubs, Wharfedale has neither.

Having looked at available land within the Ilkley and Wharfedale area, there are only two areas that are capable of accommodating manufacturing/office space and both are on the A65 heading into and out of Ilkley.

Wharfedale is the single most expensive area in which to live throughout the district. Created employment opportunities would need to support a desire and financial capability to live in Wharfedale, and by default this implies that well-paid, skilled jobs are required in Ilkley and district wide (based on current average house prices in section **F**).

It's quite one thing to aspire to create employment opportunities and quite another to deliver them. Simply having the *'where with all'* as the Bradford Chief Executive has recently stated, doesn't cut the mustard.

Manufacturing is in decline across the district and throughout the UK and provides a job concentration that's markedly lower than office-based employment and less well paid. This having been said, there's little or no evidence to show significant employment creation in either type of role within Bradford District.

Remember, we are considering 700 homes for Burley In Wharfedale and 2,400 homes in the Wharfedale corridor, all of which feed into the Principal Town of Ilkley. Again, the proposed numbers are not backed up by robust statistical evidence that employment, or the population within the area (locally or Bradford District as a whole), will increase significantly enough to justify these housing numbers.

G. Affordable homes.

Appendix 13- Affordable Homes and Bradford District's average income.

The average house price within the Burley In Wharfedale are currently stands at £372,217 – see the following page. (Source https://www.zoopla.co.uk/house-prices/ls29/).
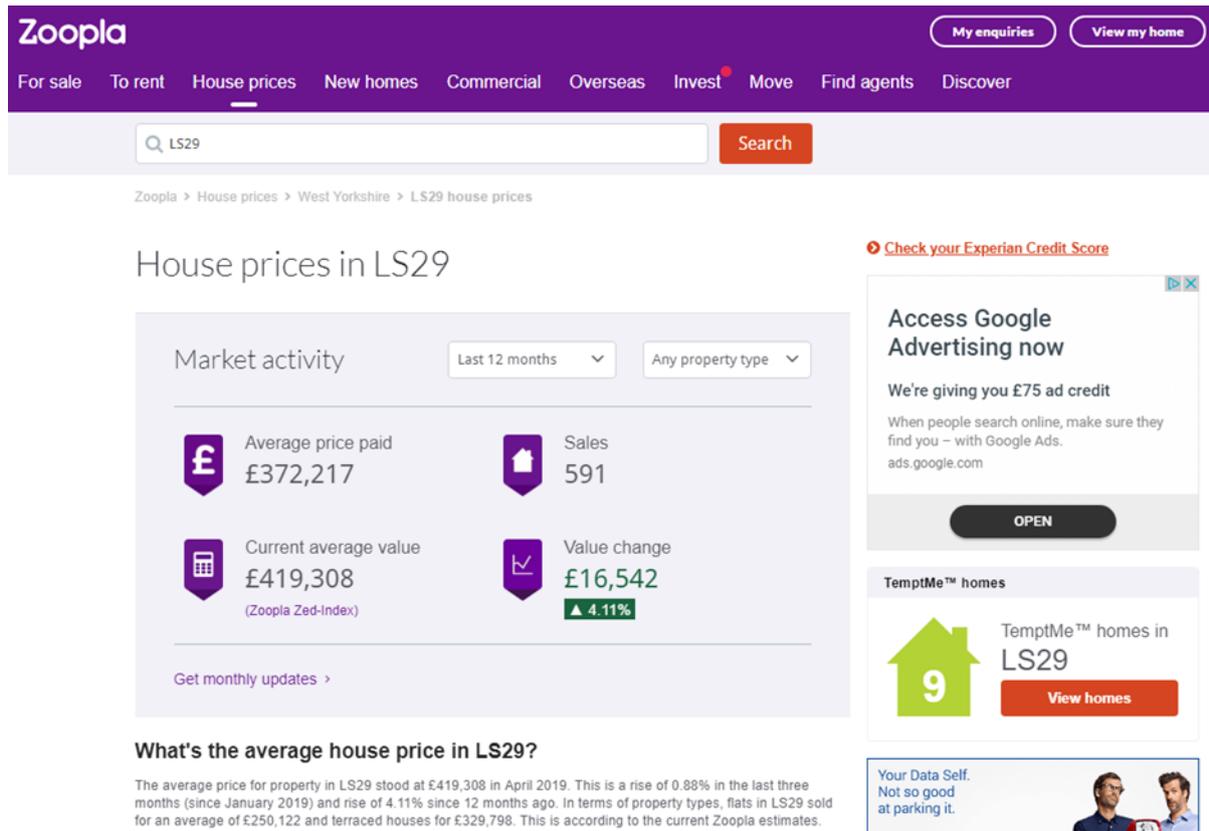
Data screenshot from website using above link supplied, appendix 13

Which brings me back to objectivity, or the lack thereof, on the part of Bradford Council who appear not to have considered the following in any detail:

1. There's a lack of supporting evidence of job creation within the District. Indeed, available statistical evidence illustrates the contrary. So how do Council reconcile this evidence with proposing large housing numbers and building on Green Belt, to meet employment needs and/or opportunities?

2. Most job advertising in the Bradford District is for Teaching, Healthcare and Nursing Jobs.

3. Can Council explain what type of jobs are being created within the District, average salaries and show how these employment opportunities necessitate

housing development on Green Belt in one of the District's most expensive housing locations?

4. "Affordable" housing is simply not affordable, when built in an expensive district for people in lower income jobs.

5. The National Planning Policy Framework (NPPF) requires that Local Planning Authorities (LPAs) identify Objectively Assessed Housing Need (OAN) and that Local Plans translate those needs into land provision targets. Paragraph 159 of the NPPF recognises that the objective assessment of housing need must be one that meets household and population projections, taking account of migration and demographic change; meets the need for all types of housing including affordable, and caters for housing demand and the scale of housing supply necessary to meet that demand. It would appear that this has been overlooked in Bradford's Core Strategy.

6. The average income within the Bradford District is **£23,670.40** and **£27,970.80** across the UK. (**Appendix 14**, Source ONS - https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/placeofworkbylocalauthorityashetable7)

   Appendix 14 – NOMIS, Work Geography Table 7.1a   Weekly pay - Gross 2017.xls

7. Based on existing mortgage rates and FCA regulation, a couple wishing to live in the LS29 area, on the average Bradford District wage of £23,670.40 per annum, assuming a 10% deposit, would only be able to obtain the kind of mortgage outlined below.

   Appendix 15 - Money Saving Expert
   https://www.moneysavingexpert.com/mortgages/how-much-mortgage-borrowing/
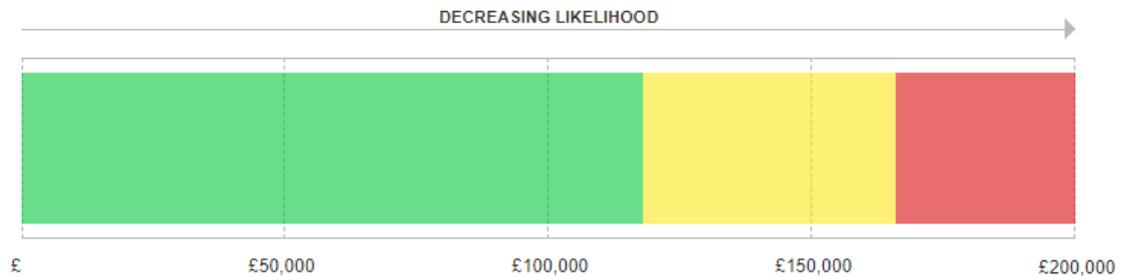
   Typical upper range of mortgage:
   Base on typical bank's lending criteria
   £118,400 - £166,000

A mortgage at **£166,000** at 3% over 25 years would cost you **£786** per month (**20%** of your pre-tax income).

Likely range of mortgage

DECREASING LIKELIHOOD

£   £50,000   £100,000   £150,000   £200,000

The nitty gritty on lenders

Lenders typically cap the loan-to-income ratio at around four-and-a-half times your annual salary, which is the upper limit in the red on the bar chart below.

Assuming you don't have existing debts and a clear credit rating you should have no difficulty in securing a mortgage in green.

Important! Remember, lenders will also assess your outgoings, including any loan agreements and credit card repayments, child maintenance payments, school fees and other bills to work out how much they'll lend. If you're a few months away from applying, try to budget as if you're already paying mortgage payments, as lenders will want evidence from your outgoings that you can afford to repay. If you haven't already, do a budget.

Website screenshot, MSE based on a couple earning the average wage, eg: 2 applicants, Appendix 15.

This sum, even with a £166,000 mortgage, falls far short of what is required to buy a house within Burley In Wharfedale. If there is "affordable housing", at 20% less than the market rate, it is still not realistically affordable for those most in need. (20% off the market average of £372,217 is still a purchase price of £297,773).

G. 1 Bradford 2010 Strategic Housing Market Assessment

From the little information available to the public from Bradford Council; the older 2010 ARC report (commissioned by Bradford council) makes it abundantly clear that Burley has sufficient housing of most types.

The only types of housing that ARC had identified as being in short supply are <u>cheap affordable housing for younger persons.</u> The ARC report, commissioned by the council itself, is never referred to by the planning officers. However, the ARC report is the only evidence by which to judge this planning application.

(See extract from Bradford's ARC4 report, which is not easily found)

Table D13 Affordable housing requirements – annual requirements 2009/10 to 2013/14 by sub-area

Designation	No. Beds	Sub-area							
		Bingley and Shipley	City NE	City Central	City West	City South	Keighley and Worth Valley	Wharfedale	Total
General needs	1	-38	-130	-134	-48	8	-25	-8	-375
	2	161	-140	219	36	17	-11	70	351
	3	-21	176	-35	230	286	-81	49	604
	4	27	-6	11	-6	52	28	1	108
Older person	1	-33	50	59	-21	34	-19	10	81
	2	6	-3	-6	-6	-6	-4	-2	-21
Total									
Net		103	-53	114	185	391	-111	120	749
Gross		194	227	288	266	396	28	130	1529

Note: some columns/rows do not add up because some of the modelled data are not integers (whole numbers)

D.48 Table D14 summarises the overall gross and net requirements for the Bradford and suggests a requirement for a broad range of affordable dwellings, in particular two and three bedroom general needs properties.

Table D14 Summary of annual gross and net requirements for Bradford District 2009/108/9 to 2013/14

Designation	No. Beds	Gross	Net
General Needs	One	8	-375
	Two	502	351
	Three	741	604
	Four +	119	108
Older Person	One/Two	160	61
TOTAL		1530	749

D.49 Assuming an annual completion of 261 affordable dwellings each year, this would reduce the net requirement to 488 each year.

Impact of in-migration on affordable requirements

D.50 The CLG needs assessment model does take into account demand for affordable accommodation from households moving into Bradford District. However, for Bradford, household growth due to in-migration, in particular international migration, is an important market driver. Further modelling has therefore been carried out to consider the impact of in-migration on affordable housing requirements.

arc⁴   195

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D.51 The 2007/8 household survey indicated that 4,618 households moved into Bradford in the preceding year. Of these households:

- 32.8% originated in Leeds; 13.3% from elsewhere in Yorkshire and the Humber, 26.8% from elsewhere in the UK and 21.6% from abroad;
- 45.9% could afford open market prices and 54.1% could not afford open market prices;
- 53% moved into private rented accommodation, 38.6% into owner occupation and 8.4% into the social rented sector.

D.52 Information on the destination and tenure of in-migrant households is presented in Table D15.

Table D15 Destination and tenure of households moving into Bradford District

Tenure	Sub-area							
	Bingley and Shipley	City North East	City Central	City West	City South	Keighley & Worth Valley	Wharfedale	Total
Owned Outright	0	164	71	0	0	64	60	359
Owned with mortgage	338	386	74	0	150	184	292	1424
Incommunities	0	34	134	0	41	0	0	209
Other HA	0	0	150	0	28	0	0	178
Private Landlord	190	266	1067	156	391	31	319	2420
Tied accommodation	0	0	28	0	0	0	0	28
Total	528	850	1524	156	610	279	671	4618
No. into social rented	0	34	284	0	69	0	0	387

D.53 If the profile of households moving into social rented dwellings is factored into the needs assessment model, the net requirement would increase to 1132 and the gross requirement to 1,714 each year (Table D16).

Table D16 Impact of including in-migrant households on overall affordable requirements

Designation	No. Beds	Sub-area							
		Bingley	City North East	City Central	City West	City South	Keighley & Worth Valley	Wharfedale	Total
General Needs	1	-38	-130	11	-48	76	-25	-8	-162
	2	161	-106	264	36	17	-11	70	431
	3	-21	176	21	230	286	-81	49	660
	4	27	-6	11	-6	52	28	1	107
Older Person	1	-33	50	96	-21	34	-19	10	117
	2	6	-3	-6	-6	-6	-4	-2	-21
TOTAL									
NET		102	-19	397	185	459	-112	120	1132
GROSS		194	226	403	266	465	28	130	1714

arc⁴ 196

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H. Bradford University and Bradford College and the Core strategy

The core strategy seeks to have:

> *F. A knowledge-driven economy, by supporting the potential of the University of Bradford, Bradford College, further and higher education institutions, hospitals and research institutions and other knowledge-intensive industries including the tourism and cultural sector and links with the provision of incubator units.and innovation units within Bradford City Centre and the Airedale Corridor.*

Extract source – BDMC website, Cores Strategy, appendix 3

Given this very clear and precise statement made by Council, in reality the opposite is now happening.

H.1 University.

There are job cuts underway at the University, as it experiences further budget pressures due to changes in government funding and a dwindling number of undergraduate applications.

The redundancies are being made to administrative, professional and support staff, and will see 165 jobs go, and includes some top-tier executives. **Appendix 16**

Source - Appendix 16: https://www.thetelegraphandargus.co.uk/news/16327942.165-jobs-to-be-lost-at-university-of-bradford/

H.2 Bradford College.

80 jobs are under threat at Bradford College after restructuring plans were announced. Bosses say they need to make significant financial savings, improve efficiency and better align their staffing with current demand.

This constitutes the first batch of redundancies, in the current round, and more are expected to follow later in the year. It comes on the back of a number of restructures and cost saving exercises over the last 5 years, as it struggles to expand and grow.

I Conclusion

What appears to come into sharp focus is that both the Core Strategy housing numbers and the plan to build on Green Belt are seriously flawed, therefore, we must question the competence and credibility of Bradford Council's Core Strategy. It does appear that both employment and population projections are incorrect and not supported by the data sets at hand. This raises a number of questions:

- Has the Local Planning Authoritie, correctly identified Objectively Assessed Housing Need?

The objective assessment of housing need must be one that meets household and population projections, taking account of migration and demographic change; meets the need for all types of housing including affordable, and caters for housing demand and the scale of housing supply necessary to meet that demand.

- Are housing number projections realistic based on the above?
- Is green belt release necessary in Burley In Wharfedale, or elsewhere in the district?

The Core Strategy supports the need for homes within the District based on specific criteria, amongst which are job creation and population growth. Both are given substantial weight within the Core Strategy. I must question the competence and credibility of Bradford Council's

That having been said:

- The population growth forecast is in decline across the District and the Council have overlooked this when calculating housing numbers. The evidence was at hand and reported by Council departments.

  However, unlike adjacent authorities, who have been significantly reducing housing numbers and forecasts, Bradford continued with its blinkered approach, ignoring 'the bigger local picture,' despite having evidence to hand. This suggests a lack of rigour in aligning such statistical evidence with its housing strategy. It also doesn't meet the NPPF criteria to be sufficiently flexible to adapt to rapid change.

  This process is supposed to be objectively assessed, according to the NPPF, but nowhere within the Core Strategy is there an objective assessment (that reflects the data).

- The second issue is that of employment. I can't find any information or evidence to support the creation of employment opportunities across the Bradford District at the scale the Council is proposing. Once again, I find the contrary to be true.

  Council have this information at hand, again supplied by ceg and Council's internal departments. The figures clearly prove that few jobs have been, or are being, created.

  There's absolutely no evidence that supports the Council's assertion that the District will create 1,600 jobs per annum during the plan period.

- Finally, in respect of housing requirement, there's a need to identify the need for different types of housing. What consistently comes to the fore here is the average salary in the Bradford District has been consistently lower than the national and Yorkshire average throughout. The type of jobs in the District and associated salaries also raise the question of affordability.

C:\Users\Bob Felstead\Desktop\APPW4705V183208020 Inquiry\MY notes\Employment_population_green_belt.docx

It's my opinion, that the site at Sun Lane should not be built based upon a significantly flawed process which appears to have relied on 'evidence' which is simply not evident or true.

It's quite clear that there have also been some significant changes to the data since the Core Strategy was adopted, consequently the Core Strategy is badly in need of review and that this should not be pre-empted by allowing the ceg: planning application.