

SUMMARY BY ROBERT FELSTEAD

Population, employment, Core Strategy and NPPF

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.

- **A.3** The land at Sty Lane, Micklethwaite should not justify the outcome of the Sun Lane development. Sty Lane remains undeveloped to date, the conclusion being that green belt is not required to satisfy a 'perceived' housing need.
- **A.4** Remarks about pupils 'walking to a school' at Sun Lane are pure conjecture. The school is not being delivered by this application.

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 consistently states that their application aligns with the Core Strategy. This is not so, at the time of their application, the Core Strategy was not adopted.

B.1 Objectivity and focus.

- The development is for people who work within the Bradford district.
Councillor Alan Wainwright made this fact abundantly clear at January's Regulatory and Appeals hearing.
- The school is not being delivered, consequently '**very special circumstances**' do not apply.

B.3 Core strategy policy EC1 and the NPPF

- I do not consider this is sustainable development in the terms of NPPF paragraphs 8-11.
- There has been no objective assessment of 11 b) of the NPPF or policy EC1 of the Core Strategy.
- Population and employment forecasts are not statistically based or sound. There's little or no evidence to substantiate the creation of 1,600 employment opportunities per annum within the district.
- Based upon NOMIS data, Bradford only creates **162** new jobs per annum.
- Based on the planning period 2015 - 2030, Bradford District has a nett deficit of jobs (compared to Bradford's Core Strategy forecast) of:

- 218,650 (2015 Experian) to 217,000 (2017 NOMIS), a nett loss of 1,650 jobs plus 3,200 forecasted jobs, a total of 4,850 at best.
- 223,000 (2015 NOMIS) to 217,000 (2017 NOMIS) a nett loss of 6,000 jobs plus 3,200 in Bradford's forecast, a total loss of 9,600 jobs at worst.

Throughout the planning process there has been a lack of attention to detail to Socio-economic drivers. This is counter to the objectives set out in the:

- NPPF, page 6
- Policy EC1 of Bradford's Core Strategy - job creation.

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%.

We have seen a further decline in employment across the district since that time.

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 population growth rate.

It's further noted that in July 2017, using ONS population projections to 2026, that the total population of the Bradford district is expected to increase by nearly 23,300 (4.3%); 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.

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

In consideration of 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 NOMIS data sets.

D Employment and job creation.

Bradford Core Strategy, policy EC1, sections A through F are relevant to employment.

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) during a period in which employment across the Bradford district is almost static. **Precisely where are the Council's objectively assessed needs, that are demanded by the NPPF?**

The actual employment figure for the year 2005 as quoted by NOMIS is **214,900**. Figures quoted by the appellant and council are markedly different despite the Core Strategy being the subject of considerable '*scrutiny*.'

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

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**, an average of **162** jobs per annum. Bradford Council have forecast a figure which is **10 times the average** annual increase over the previous 13 years.

Employment based on historical NOMIS data, indicates that as few as 2,450 additional jobs will be created in the Bradford district during the planning period to 2030.

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

Bradford district has struggled to achieve significant employment growth.

PWC have recently announced that they are to create 225 jobs in Bradford. Despite this increase, Bradford are currently a minimum **4,800** jobs adrift of employment figures predicted in 2018 by the Core Strategy.

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 for retail and Nursing staff.

Job losses, policy EC1 part C

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

HMRC are closing its operation at Forster Square in 2021, moving offices to Wellington Place in Leeds. HMRC has recently confirmed that they are to close a further 2 offices in Bradford this year.

Bradford & Bingley plc (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.

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.

Damart who are a large employer within the Bradford district, whilst remaining profitable, operation profits are down. This is quite significant as Damart serve a growing UK sector, the over 65's. Are Damart the next employer that could potentially see a fall in head count?

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.

E Unemployment.

In real terms, the increase in the unemployment claimant count illustrates that Bradford has a consistently high unemployment rate above the national, Yorkshire and Humberside average.

E.1 Conclusion.

Unemployment across the district reinforces the fact that Bradford's employment forecast is incorrect. Once again, the competence and credibility of the data in the Core Strategy is questionable.

F Housing numbers proposed in Wharfedale.

Within Wharfedale over 2,400 homes are being built.

The Core strategy calls for employment land within Wharfedale, and 5 hectares have been identified by the Core Strategy. There is no mention of where this land will come from within the Core Strategy, however, as Burley is designated as a Local Growth Centre that serves the Principal Town of Ilkley, we must assume that jobs are to be created within the Principal Town of Ilkley and the Bradford district.

G Affordable homes.

Wharfedale is the most expensive place to live in the Bradford district.

Employment opportunities would need to support a desire to live in Wharfedale, and by default this implies that well paid jobs are created in the district.

Average house prices within Burley In Wharfedale stand at £372,217.

1. The average income within the Bradford District is **£23,670.40**
2. Based on existing mortgage rates, a couple wishing to purchase in the LS29 district earning the average district income, would be offered a mortgage of between **£118,400** and **£166,000**.

G.1 Bradford 2010 Strategic Housing Market Assessment

The only types of housing that ARC had identified as being in short supply are cheap affordable housing for younger persons.

H Bradford University and Bradford College and the Core strategy

165 job cuts come as the University experiences further budget pressures due to changes in government funding and a dwindling number of undergraduate applications.

80 jobs are under threat at Bradford College after restructuring plans were recently announced.

I Conclusion

We must question the competence and credibility of Bradford Council's Core Strategy, as both employment and population projections are incorrect and not supported by data.

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.

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.