

Local Plan for the Bradford District: Technical Paper 1

Policy SP8: Housing Growth

1. INTRODUCTION

- 1.1. This technical paper aims to provide further reasoned justification detail of the strategic policy SP8 Housing Growth relating to the scale of housing required, strategic housing distribution and overall strategic approach to meeting housing needs. It includes an overview of how the policy approach has evolved from the early stages of plan preparation on the Core Strategy Partial Review, the evidence which underpins the policy, and how the policy approach accords with Government guidance within the National Planning Policy Framework (NPPF).

2. OVERVIEW OF KEY EVIDENCE BASE DOCUMENTS

- 2.1. A summary of the key evidence base documents is set out below – these are discussed in more detail in the subsequent sections.
- 2.2. The Strategic Housing Market Assessment (SHMA) 2019– a study commissioned to provide an evidence base for estimating local housing need and demand across the District, consider future demographic trends, and identify the housing requirements of specific groups such as BME households, first time buyers, families with children, people with disabilities and older people.
- 2.3. The SHMA Addendum Report (2021) – updates the SHMA (2019) report to take account of the issuing of the Government’s latest Standard Method for assessing Local Housing Need and updated Demographic Evidence
- 2.4. Bradford Updating the Demographic Evidence (2020)- a study in support of the SHMA to provide further insight into how Local Housing Need as calculated using the Government’s Standard Method and projected employment growth in Bradford aligns with the latest demographic evidence and forecasts.
- 2.5. Strategic Land Assessment (SLA) January (2021) - provides an analysis of the deliverable and developable land supply in the District.

3. SP8: Housing Growth: Criteria A - The District's Housing Requirement

- 3.1 One of the key roles of the Local Plan is to determine the minimum number of homes needed to be planned for to meet identified local housing need.
- 3.2 The provision of sufficient new homes of the right quality is key to achieving the Local Plan's Vision and Objectives and will provide both direct and indirect benefits to the District's economy. Furthermore, the Council considers access to good quality housing to be a key requisite for improving life prospects, in particular for health and educational attainment.
- 3.3 Determining the housing requirement is a critical part of the Local Plan as it feeds directly into the spatial strategy by determining how much land is needed for new housing development. National planning policy states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment (LHNA), conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach (NPPF, paragraph 60).
- 3.4 Determining the housing requirement for the District has been undertaken in three key stages.
 - Firstly, in line with the NPPF, the Council has undertaken a Local LHNA, conducted using the latest standard method in national planning guidance.
 - Secondly, it has then been considered whether local circumstances justify if an uplift to the baseline local housing need is justified. This has been assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).
 - Thirdly, it has been considered whether it is feasible and appropriate to plan for this level of housing growth considering such constraint factors as deliverability, land supply, environmental impacts and Green Belt.

4. Assessing Local Housing Need

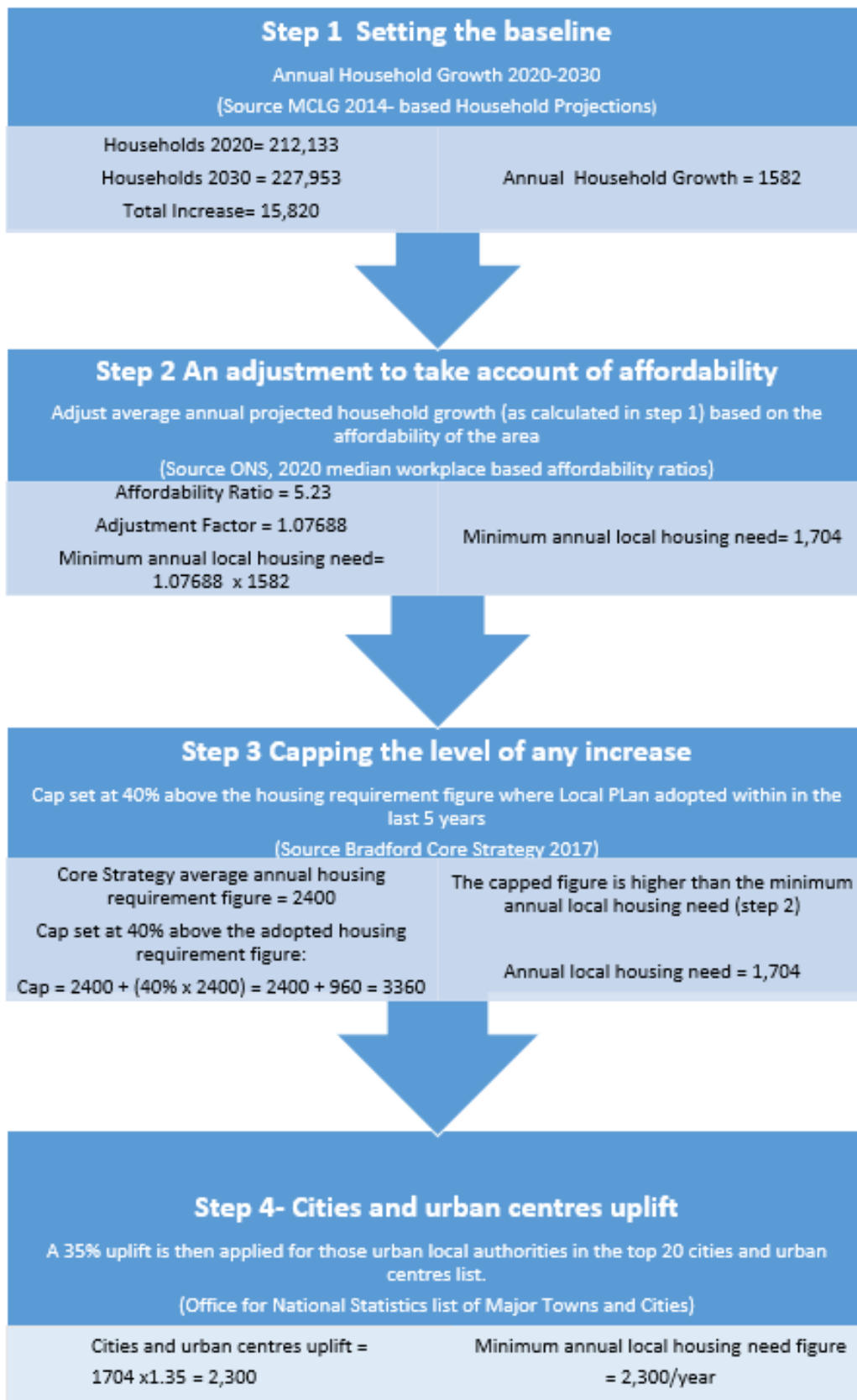
- 4.1 The Government's latest standard method for assessing local housing need uses a formula to identify the minimum baseline number of homes to be planned for, which addresses household growth and historic under-supply. The latest planning practice guidance (PPG) updated in December 2020 details the standard method for

assessing housing need and clarifies that the 2014-based household projections should be used to set the 'baseline' (Step 1).¹

- 4.2 The standard method provides the Council with an annual number of new homes, based on a 10-year baseline, which should then be applied to the whole plan period. The latest standard method then includes an additional step, which is to apply a 'cities and urban centres uplift' of 35% to those urban local authority areas in the top 20 cities and urban centres list, which Bradford is currently in. This equates to an extra increase of 596 new homes/year period or an additional 10,728 homes over the 18-year plan period 2020-2038. Figure 1 (below) summarises the standard method calculation as it currently stands.

¹ PPG Housing and economic needs assessment www.gov.uk/guidance/housing-and-economic-development-needs-assessments

Figure 1: Bradford Standard Method Calculation



- 4.3 It is important to note that the Government's standard method identifies a minimum annual local housing need figure. The PPG also identifies that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. In line with the PPG the council has considered if there are any factors to justify any uplift to the LHN figure as set out above. In addition, in line with the PPG, the council has also considered as part of the SHMA evidence if an increase in the total housing figure may be needed to deliver the required number of affordable homes.
- 4.4 It is important to note that the standard method LHNA figure already includes a number of methodology or calculation components which lead to an 'uplift' over and above the latest official national household growth projections for the District. These include the use of the 2014-based household projections, rather than the latest 2018 official household projections, which show lower levels of household growth compared to the 2014 projections. In addition, the standard method includes the application of a capped affordability uplift. Finally, the new standard method also includes a cities and urban centers uplift. This uses an uplift of 35% to the LHN, which could be interpreted as a national policy requirement and is not related to local land supply or official demographic and household change in the District.
- 4.5 The Government's standard method therefore already provides an uplift above projected demographic household growth in the District. The Council has explored the demographic evidence of household growth in the District in greater detail through the HMA and Updating the Demographic Evidence (2021) reports. This clearly shows that planning for household growth in line with the baseline standard method figure of 1,704 dwellings per year exceeds alternative demographic scenarios of household growth in the District.

5. Growth strategies and Strategic Infrastructure Uplift

- 5.1 The Council has assessed updated evidence on housing and economic needs, in line with latest national policy and guidance when considering the overall housing requirement. This includes demographic and employment led housing growth scenarios. It is recognised that the District has strong ambitions for economic growth as set out in its Economic Growth Strategy 2018-2030. This strategy sets ambitious targets for growing the economy. The Local Plan will support these ambitions and aspirations. In addition, the council recognise the importance of the Leeds City Region (LCR) Growth Deal in supporting planned growth and regeneration in the District. However, it is important to note that this deal was formally agreed in 2015

and is allocated to support delivery of a range of existing housing and regeneration projects across the LCR including Bradford. In addition, the West Yorkshire £1.8bn devolution deal will bring in additional investment over the next 30 years in a new West Yorkshire Investment Fund which will be important to support delivery of housing and economic growth ambitions outlined in the plan. However, while strategically important in supporting planned growth it is not currently considered that this funding alone will drive an additional increase in local housing need in the District over the 18-year plan period. The Council will continue to monitor the allocation of planned investment through the Local Infrastructure Plan and consider this as part of any plan review in regards to LHN.

- 5.2 Whilst the Council has strong ambitions for growing the District's economy, analysis of latest economic and demographic evidence in the Employment Land Review (ELR), Future Employment Analysis Paper (2021) and the SHMA do not currently demonstrate at present any clear evidence for an economic uplift from the baseline LHN figure. There is no evidence that the District has an 'overheated' jobs market with new labour demands driving a need for housing above the minimum standard method figure. Indeed, the economic evidence in the ELR and future employment analysis paper indicates the opposite – a low job density level, low economic activity rates and relatively high unemployment rates. This highlights a degree of labour capacity within the existing population. There is flexibility in the indigenous labour market with the right incentives to support economic growth without pushing housing demand beyond the baseline LHN figure set out in the Local Plan. Updated evidence reports - Updating the Demographic Evidence (2021) and Future Employment Analysis Paper (2021) indicates that the Local Plan's economic and jobs ambitions will be broadly supported by housing growth figure in line with the latest LHNA and indeed would be supported by the baseline LHN of 1,704. This evidence also highlights the increased uncertainty of economic projections at the current time given impacts. In summary, the council do not consider there is currently any clear justification or evidence for an uplift to the Government's standard method in regards to economic growth strategies.
- 5.3 There are a range of planned improvement to existing transport infrastructure and regeneration programmes, including the Towns Fund in Shipley and Keighley, that are considered within the plan as important for supporting regeneration ambitions, economic and housing growth as set out in the plan and delivering the proposed housing requirement. These initiatives therefore are not considered on their own to represent strategic transformational improvements to infrastructure, which would

drive an increase in housing need over and above the standard method baseline figure or to justify an uplift to the overall housing requirement. With regards to strategic infrastructure improvements, the Council considers that the Northern Powerhouse Rail (NPR) project provides Bradford with a once in a lifetime opportunity to improve its rail connectivity and allow the city to operate at its full potential, contributing to economic growth across the north of England. The Council has commissioned a range of technical studies to support the wider economic case for a NPR station in Bradford city centre and understand the combined economic potential of the cities for Leeds and Bradford post High Speed 2 and NPR.

- 5.4 The Council has mainstreamed support for this project within the Local Plan and identified the Southern Gateway extension of the City Centre as a broad location for growth in anticipation of longer term transformation change in this area. However, the extent and timing of any impact on need within this plan period from NPR is still uncertain as is the capacity of the Southern Gateway Area to provide additional land supply. The Local Plan makes an assumed land supply contribution in this area based on future uplift from a new NPR station towards the end of the plan period in order to meet the baseline 1,704 requirement. At present it is not considered possible to assume any greater contribution from additional land supply within the plan period, though that may change as investment plans are developed and finalised.
- 5.5 The Local Plan also details the opportunities which may arise from the implementation of a new Mass Transit system across West Yorkshire. This project is at early stages and the Council will continue to work with stakeholders including West Yorkshire Combined Authority to understand its wider transformational role.
- 5.6 In summary, based on the latest available housing and economic evidence it is considered that there is currently no clear justification for an uplift to the baseline LHN figure of 1704. In addition, there is considerable uncertainty regarding the impact of Brexit and COVID on the economy over the next few years. Some of the key tasks at hand relate to economic recovery and tackling unemployment and sector impacts created through the pandemic. The Council will continue to monitor economic growth forecasts, committed strategic infrastructure investment, economic performance and housing market indicators and keep the local housing need figure under review though the requirement to review local plans at least every 5 years. It will also take a positive and flexible approach to supporting delivery of new additional housing on windfall and brownfield sites to support the council's growth and regeneration ambitions.

6. Unmet Housing Need from Neighbouring Authorities

- 6.1 Any housing needs that cannot be met within neighbouring Local Authorities should also be taken into account in establishing the amount of housing to be planned for. The Council currently has no agreement to take any unmet need from neighbouring Local Planning Authorities, as set out in a statement of common ground and Duty to Cooperate Action Plan.

7. Determining the Housing Requirement

- 7.1 National planning policy, through the presumption in favour of sustainable development (paragraph 11b), is clear that LPAs should provide for their objectively assessed housing need unless there are protected areas (constraints) as set out in national policy that provide a strong reason for restricting the overall scale of growth or any adverse impacts of meeting assessed housing need would significantly and demonstrably outweigh the benefits.
- 7.2 In setting the housing requirement it is therefore necessary to consider whether the baseline LHN figure of 1,704 can be met in terms of any strategic constraints and any significant adverse impacts of delivering this figure.
- 7.3 The new standard method includes an additional 'cities and urban centres uplift' of 35% to the LHN baseline for Bradford. This represents an extra 596 new homes/year above the baseline 1,704 LHN figure. This represents an additional 10,728 homes over the 18-year plan period (2020-38).
- 7.4 A number of evidence documents have considered land supply (SLA), the social, environmental and economic effects of development (Sustainability Appraisal/Habitats Regulations Assessment/Health Impact Assessment) and the capacity of existing (or need for new) infrastructure to support the scale of planned growth (Local Infrastructure Plan).
- 7.5 The District also contains a number of protected areas or assets of particular importance as defined in the NPPF (paragraph 11) including Green Belt and Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Further evidence, including the Green Belt Review, Open Space Assessment, Heritage Impact Assessment and Strategic Flood Risk Assessment have been considered through the plan preparation with regards to strategic constraints to land supply in the District.

- 7.6 The PPG is clear that the extra increase in the number of homes to be delivered in urban areas through the 'cities and urban Centres uplift' (35%) is expected to be met by the cities and urban centres themselves, rather than the surrounding areas with a clear priority on brownfield and other under-utilised urban sites. The Council has already sought to maximise delivery within the Regional City of Bradford and based on current land supply assessments has generally exhausted the range of deliverable / developable brownfield or under-utilised site opportunities for growth within the urban area.
- 7.7 An uplift of 35% (10,728 dwellings and potentially about 25,000 people) would also need to be considered in terms of its impact on built heritage, existing communities, open and green spaces, transport and air quality, flood risk and the ability to be deliver liveable sustainable neighbourhoods supported by an appropriate range of infrastructure, services and facilities.
- 7.8 It is clear from national planning policy that protection to Green Belt remains a priority and that the cities and urban areas uplift should therefore be met primarily in the urban area itself. Also it is clear that the 35% uplift should only apply to the urban area of Bradford and therefore should not apply to a housing requirement or targets for settlements in the rest of the District
- 7.9 The Local Plan proposes to meet the LHN baseline of 1704 dwellings per annum in full and although challenging this is considered to deliver sustainable development without compromising the strategic function of the Green Belt and while also maintaining the quality of the District's environmental assets and landscape.
- 7.10 Within the proposed housing distribution, the Regional City of Bradford is the prime focus for housing growth with approximately 70% of the total housing growth focussed on this settlement. When assessed against a housing requirement figure of 1,704 and maximising all available brownfield and greenfield site options in the Bradford urban area this requires significant Green Belt releases of approximate 3,144 homes around this settlement.
- 7.11 An additional 10,728 homes within the Regional City over the plan period would therefore likely require substantial additional Green Belt releases, as based upon the current land supply position all available and suitable brownfield and suitable greenfield options have been identified. Any additional land requirement in this area would therefore likely result in significant adverse impacts on landscape, the historic environment, flood risk, air quality, transport congestion and open space within the Regional City of Bradford and require significant additional Green Belt release.

- 7.12 The Council is ambitious and supports sustainable housing growth in the District. However, without the identification of significant additional funding to unlock substantial amounts of new land and opportunities and supporting infrastructure within the Bradford urban area, it is considered setting a Local Plan Housing Requirement based on the uplifted LHNA figure of 2,300 new homes/year is neither currently justified or deliverable.
- 7.13 The Council will therefore seek to meet a minimum housing requirement of 1,704 new homes/year over the plan period. This will ensure that the housing requirement will meet (and exceed) demographic housing need in terms of projected household growth and provide significant additional market and affordable homes. This housing requirement would also represent a significant boost in housing delivery over recent years. At this draft plan stage the Council is also undertaking a call for sites orientated towards understanding whether there are any new or additional housing sites which have not been identified through the SLA to date and could come forward to support housing growth within the Bradford Urban Area in particular. This information will be reviewed as part of the plan development.
- 7.14 Once adopted, the Council will keep the Local Plan under review and work with Government to identify future funding or opportunities to support delivery of additional sustainable growth and development within the Regional City of Bradford through brownfield opportunities, using underutilised land and buildings and estate regeneration.
- 7.15 Table 1 below summarises the approach and key steps undertaken in setting the housing requirement, which is then detailed in the new Strategic Policy SP8 Housing Growth. The housing allocation requirement and strategic housing distribution, which includes the prior consideration of windfall and clearances / losses, is discussed further within the policy.

Table 1: Calculating the Housing Requirement

Local Housing Need (LHN)		Annual LHN	Plan period 2020-2038 (18 years)	Total Baseline LHN
A	Local Housing Need assessment	Step 3 + Step 4 $(1704 + 596)$ = 2,300	Annual LHN x plan period $(1704 \times 18 + 596 \times 18) =$ 2300×18	Baseline LHN $(30,672 + 10,728) =$ 41,400
B	Local Housing Need Uplift	N/A	N/A	N/A
C	Unmet need taken from neighbouring LPAs	N/A	N/A	N/A
D	Uplift to deliver additional affordable housing	N/A	N/A	N/A
E Total Local Housing Need (with 35% uplift)	A+B+C+D	2,300	2300 x 18	41,400
F	Reduction due to the application of NPPF policies that protect areas or assets of particular importance in the plan area	596	596×18	10,728
G	Any unmet need taken by neighbouring LPAs	N/A	N/A	N/A
Total Housing Requirement	E-F	1704	1704 x 18	30,672

8.0 Policy SP8: Housing Growth: Criteria E – Spatial Distribution

8.1 The purpose of this section of the technical paper is to provide some more details on a number of aspects underpinning the spatial distribution of housing growth as set out within Policy SP8 of the draft Local Plan. In particular, it provides:

- Information relating to the range of evidence which underpinned the distribution;
- Data on the contribution which housing commitments make to the housing targets on a settlement by settlement basis;
- Information and commentary on how the proposed housing distribution differs from the baseline population proportionate distribution and the reason why

Reprise of the Broad Approach to Determining Distribution

8.2 It is not the purpose of this paper to set out in full the process and factors that were taken into account. However, a brief summary of the approach is given below.

8.3 In overall terms the aim of setting a spatial distribution is to shape the pattern and distribution of housing growth to ensure that:

1. Housing growth is where possible concentrated on areas where the need is greatest i.e. where the population and household growth is focused and where there is a need to provide additional affordable housing;

The Council has gathered a range of demographic evidence in support of the Plan, most notably the Strategic Housing Market Assessment (SHMA) and this continues to show housing need most acutely focused within the main urban areas. However, the SHMA also reveals a need for affordable housing across the district. This and the need to ensure that the role, function and local services of smaller settlements are supported means that all settlements within the defined settlement hierarchy have been assigned some housing albeit at very different scales.

2. The need for new homes is met in a sustainable way which supports the district's economy and reflects planned changes in infrastructure;

The Local Plan sets out a defined settlement hierarchy (Policy SP3) with the Regional City of Bradford, then the Principal Towns of Ilkley, Keighley and Bingley, followed by Local Growth Centres and finally smaller settlements which are described as Local Service Centres. The hierarchy reflects the size, role and functions of those settlements and the levels of jobs, services within them and their connectivity by both road and public transport to other centres. The proposed distribution reflects this hierarchy by focusing most growth on the higher tiers of the hierarchy and thus by default on those locations which are the most sustainable locations for growth. In doing so the plan is also supporting other goals such as minimising the need to travel and addressing climate change.

3. The distribution proposed maximises the benefits of development (for example making good use of brownfield land and securing investment and improvement in key regeneration areas) and;

The proposed distribution reflects the different regeneration programmes which the Council is progressing such as in the Canal Road Corridor, in Shipley and Keighley reflecting the Government's Towns Fund, within Bradford City Centre and within Holme Wood. It also takes account of the medium longer term opportunities for growth which will be unlocked by investment in the Southern Gateway and as a result of Northern Powerhouse Rail.

4. Minimises environmental impacts - for example directing development towards areas of lowest flood risk and avoiding significant impacts on areas designated for the value e.g. wildlife habitats, open space.

The Council has mapped and taken into account a wide range of environmental constraints and has taken these into account directly (by screening out certain sites which lie within areas which Government guidance suggest housing development would normally be inappropriate – for example national designations such as SSSI's) and indirectly by directing development to areas of lowest flood risk.

5. The proposed housing distribution is deliverable and reflects the realities and constraints of land supply.

Ultimately the housing targets and housing distribution has to reflect the realities of the available land supply. The housing targets set reflect the land supply data from the Strategic Land Assessment (SLA) and a limited number of broad locations for growth where additional sites and potential is expected to be unlocked by investment in infrastructure and regeneration programmes (i.e. for Keighley and the City Centre and Southern Gateway).

Evidence & Impact Assessments

- 8.4 In addition to the Draft Local Plan itself, the Council has published a wide range of evidence, information and technical studies which have informed its content including the preferred option for the distribution of housing growth. These are detailed below under para 8.5 to 8.9.
- 8.5 Strategic Housing Market Assessment (SHMA) – Using a variety of housing, economic, demographic and other data the SHMA provides an assessment of the scale, type and need for new homes in particular focusing on the need for affordable and special needs housing. It enables the Council to set targets for proportion of affordable houses within individual developments, these targets reflecting the scale of need and viability levels within different areas. It is relevant to the spatial distribution of housing growth as it indicated where adjustments to targets may assist in delivering the right number of affordable homes. The need for affordable homes in the higher value areas of the district such as Wharfedale is one of the reasons why it is important to plan for at least some growth and development within these settlements. However, it remains the case that the greatest quantum of affordable housing need is within the main urban areas.

- 8.6 Strategic Land Assessment (SLA)– this document – formerly termed the SHLAA – is critical in setting housing targets as it sets out the quantum of suitable, available and deliverable or developable land which exists within each settlement and the number of homes which may be accommodated on that land. The SLA, together with the Brownfield Register also provide the information on the amount, location and distribution of deliverable and developable brownfield land and thus enable the production of housing distribution which maximises the use of such land.
- 8.7 Strategic Flood Risk Assessment - SFRA Level 1 - the Council have commissioned consultants JBA Ltd to produce a Level 1 SFRA. This is designed to identify the main source of flood risk across the District and has involves screening of proposed site allocations against the available flood risk evidence. The SFRA provides a high level assessment of the vulnerability to flooding of potential development sites and identifies the level of flood risk and development considerations, including the need to apply the exceptions test where necessary. The SFRA has informed the housing distribution and setting of targets because an overall goal, in line with Government guidance, is to avoid development in areas of highest flood risk and utilise a sequential approach to direct development to areas of lowest flood risk.
- 8.8 Green Belt Review – the Council has published studies which assess both larger strategic parcels of land and also sites which are options for allocation in terms of the contribution which they make to the 5 purposes of Green Belt as set out in the NPPF. The Green Belt review does not directly determine the housing targets as the options for both housing distribution and specific site allocations has to reflect a variety of factors (not just Green Belt impact) which together indicate their sustainability or otherwise. However, the Green Belt review does contribute by providing an overview of the extent of land around settlements which may be released without major impacts on the functioning of the Green Belt (and conversely where there is a lack of such options).
- 8.9 Sustainability Appraisal (SA) - In line with section 19 of the Planning & Compulsory Act (2004) the Council's preferred options has been informed by the results of a sustainability appraisal (SA). This has been applied to policies, strategic aspects of the Plan such as the spatial distribution of housing growth, and to the proposed development sites. The role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Pages 101-2 of Section 3 of the Draft Plan sets out the reasonable alternative options for distribution which were considered by the Council and subject to SA.

Distribution Commentary – Baseline vs Core Strategy Partial Review vs Adopted Core Strategy

- 8.10 The Draft Local Plan explains that the starting point for deriving the housing distribution was to split the overall district housing requirement directly in relation to the proportion of population within each settlement.
- 8.11 Using data from the ONS midyear population estimates for 2019 and GIS software, an estimate was made of the population within the settlement boundaries of each town, village or in the case of the Regional City, each sub area. No attempt was made to assign population in rural areas outside these settlement boundaries. The district wide housing requirement (after allowance for windfall and clearance) of

27,672 was then assigned according to the proportion of population in each settlement. The distribution which would result in such an approach is indicated below:

Table 2 – Baseline Distribution of the Housing Requirement Based Solely on Population

Regional City of Bradford	18,859		
Bradford City Centre	525	Bradford NE	4,870
Shipley & Canal Rd Corridor	163	Bradford SE	3,229
Shipley	982	Bradford SW	5,046
		Bradford NW	4,043
The Principal Towns	4,299		
Bingley	940	Keighley	2,602
Ilkley	756		
Local Growth Centres	2,006		
Burley in Wharfedale	326	Silsden	405
Menston	228	Steeton with Eastburn	252
Queensbury	485	Thornton	310
Local Service Centres	2,509		
Addingham	164	Harden	79
Baildon	820	Haworth	330
Cottingley	259	Oakworth	187
Cullingworth	155	Oxenhope	101
Denholme	149	Wilsden	198
East Morton	66		

- 8.12 As indicated in the draft plan, the baseline distribution can only be a starting point, as it does not reflect the realities of the scale and distribution of land supply, of environmental constraints or the opportunities for sustainable development within regeneration areas and areas which are to be the subject of investment and transformation change.
- 8.13 The section below therefore describes the extent to which the proposed distribution differs from the baseline and the key reasons behind those differences.

- 8.14 In the table colour coding indicates the locations with the greatest departure from the baseline figure. Green indicates targets well below the baseline and orange targets well above.
- 8.15 A further table is included at Appendix 1 which sets out the differing targets and percentage distributions in each of:
- The Draft Local Plan just published;
 - The baseline population proportionate distribution;
 - The Core Strategy Partial Review Preferred options consultation of July 2019;
 - The Adopted Core Strategy of July 2017
- 8.16 The table is accompanied by some notes which set a warning in comparing the numbers too closely as in each case key parameters differ such as the plan period, the overall district housing requirement, and the land supply thought to be available, deliverable and developable at the time.

Table 3: The Regional City of Bradford

AREA	POLICY SP8 TARGET	% OF DISTRICT WIDE TOTAL	DIFFERENCE FROM BASELINE NUMBER
Regional City Of Bradford	20,075	72.5	1,216
Bradford City Centre	7,000	25.3	6,475
Shipley & Canal Rd Corridor	1,750	6.3	1,587
Bradford NE	1,850	6.7	-3,020
Bradford SE	2,200	8.0	-1,029
Bradford SW	3,175	11.5	-1,871
Bradford NW	2,900	10.5	-1,143
Shipley	1,200	4.3	218

- 8.17 Overall the level of growth proposed for the Regional City is slightly above the level which would arise by using the baseline population proportionate approach. This underlines the sustainability of the proposed approach which is concentrating growth where need is greatest, where there are concentration's of jobs and services and where connectivity by both public transport and by road is greatest.
- 8.18 However, the distribution within the Regional City's different parts differs markedly from the baseline. The population proportionate approach if followed would fail to take advantage of and support growth and regeneration opportunities within the City

Centre and the Canal Road Corridor which at present still have relatively low population levels (hence the low values for these areas in the baseline distribution). And in so doing it would result in much more dispersal of development to the outer edge of the urban area than proposed in the draft Plan since limitations on land supply within those areas would inevitably mean the need for more Green Belt releases. Though Green Belt releases can occasionally represent sustainable options the Council detailed site appraisal work has indicated that many of the Green Belt options (i.e. sites rejected by the Council) would not represent sustainable options and would be environmentally damaging.

- 8.19 Appendix 1 provides a comparison between the housing targets for the period 2013-30 in the adopted Core Strategy and the current Draft Local Plan. As indicated previously the two plans are not directly comparable, they have different plan periods and different housing requirements. Some of the growth as indicated in the Core Strategy has now been delivered and implemented. However, a comparison of the numbers is useful as they illustrate the scale and rate of housing growth being proposed.
- 8.20 From this it can be seen that housing targets in the current draft plan are almost all of a lower scale in the Regional City than in the adopted plan – a plan found sound at examination. The only exception being the City Centre. The much higher targets for the City Centre reflect the scale of land supply available, the increasing scope of housing delivery linked to changes and relaxations in the use classes order allowing for conversion of city centre properties to residential use, and most important the development opportunities tied to regeneration and investment including NPR and within the Southern gateway.

Table 4: The Principal Towns

AREA	POLICY SP8 TARGET	% OF DISTRICT WIDE TOTAL	DIFFERENCE FROM BASELINE NUMBER
Principal Towns	3,350	12.1	-949
Bingley	850	3.1	-90
Ilkley	300	1.1	-456
Keighley	2,200	8.0	-402

- 8.21 Overall the level of growth proposed for the Principal Towns lies below the level which would arise by using the baseline population proportionate approach. The biggest differences are for Ilkley and Keighley. In both cases limitations on sites / land supply which has been assessed to be suitable for allocation is the prime reason.
- 8.22 For each of the settlements the proportions of growth, the rates and levels of growth are at a lower level than that within the adopted Core Strategy. The Council appreciates the need to support the roles of the Principal Towns, however the proposed targets reflect what the Council considers can be accommodated in a sustainable way.

Table 5: The Local Growth Centres

AREA	POLICY SP8 TARGET	% OF DISTRICT WIDE TOTAL	DIFFERENCE FROM BASELINE NUMBER
Local Growth Centres	2,875	10.4	869
Burley in Wharfedale	625	2.3	299
Menston	350	1.3	122
Queensbury	450	1.6	-35
Silsden	700	2.5	295
Steeton with Eastburn	175	0.6	-77
Thornton	575	2.1	265

- 8.23 Overall the level of growth proposed for the Local Growth Centres is above the level which would arise by using the baseline population proportionate approach. This reflects the available and suitable land supply and the amalgamated results of the detailed site appraisals which have now been undertaken.
- 8.24 However, although it may appear that these settlements have been assigned high targets it should be noted that the overall proportion of development proposed within this draft plan to them is slightly lower than the equivalent within the adopted Core Strategy. Moreover, the targets for each one, (albeit again for a new plan period which is adding to the growth that has occurred in recent years) is lower than in the Core Strategy, in some cases such as for Queensbury, Silsden and Steeton with Eastburn.

Table 6: The Local Service Centres

AREA	POLICY SP8 TARGET	% OF DISTRICT WIDE TOTAL	DIFFERENCE FROM BASELINE NUMBER
Local Service Centres	1,375	5.0	-1,134
Addingham	175	0.6	11
Baildon	250	0.9	-570
Cottingley	150	0.5	-109
Cullingworth	175	0.6	20
Denholme	80	0.3	-69
East Morton	10	0.0	-56
Harden	60	0.2	-19
Haworth	250	0.9	-80
Oakworth	75	0.3	-112
Oxenhope	25	0.1	-76
Wilsden	125	0.5	-73

- 8.25 Overall the level of growth proposed for the Local Service Centres lies well below the level which would arise by using the baseline population proportionate approach. This is partly the result of analysis of sites and land supply options and the need to avoid allocating land which would be environmentally damaging or unsustainable. It also reflects the fact that the adopted Core Strategy was dealing with a much higher annual housing requirement and this in turn required a greater level of dispersal of development to the smaller settlements than is required for the new Plan.
- 8.26 The most significant difference between the baseline target and the preferred option lies with Baildon. In this case the lack of suitable sites and land supply is the main issue.
- 8.27 As might be expected the housing targets for these settlements are all below the levels within the adopted Core Strategy. However, it should be noted that the proportion assigned to this tier of the hierarchy is only slightly lower at 5% vs the 6.1% in the adopted Core Strategy.

Housing Commitments

- 8.28 As explained in the Draft Local Plan – existing commitments – that is sites under construction (where units are projected to be delivered during the plan period i.e. 2020 onwards) and sites with detailed planning permission have been taken into account as making a contribution to meeting the specified housing targets.
- 8.29 Although the deliverability of these sites has been assessed within the SLA it is unrealistic to expect that all will be fully developed and inevitably circumstances on the ground change. It is standard practice therefore to apply an element of discounting to the assumed supply and in so doing enhance the certainty that overall housing requirement will be met. In this instance, again in line with common practice a 10% discount has been applied. The resulting contributions for each settlement are set out in the table below.
- 8.30 Sites with outline planning permission and which are considered developable have been allocated for development to protect their status and are not included in the above figures. Also not included is the New Bolton Woods site which has a hybrid planning approval and which is also allocated.

Table 7: The Contribution to Settlement Targets from Housing Commitments

Settlement	No.	Discounted
City Centre	1241	1117
Canal Rd	96	86
NE	1319	1187
SE	92	83
SW	1101	991
NW	899	809
Shipley	32	29
Regional City	4780	4302

Settlement	No.	Discounted
Addingham	13	12
Baildon	81	73
Cottingley	3	3
Cullingworth	71	64
Denholme	17	15
East Morton	6	5
Harden	13	12
Haworth	77	69
Oakworth	0	0
Oxenhope	5	5
Wilsden	13	12
Local Service Centres	299	269

Settlement	No.	Discounted
Ilkley	22	20
Keighley	552	497
Bingley	163	147
Principal Towns	737	663

Settlement	No.	Discounted
Burley	93	84
Menston	207	186
Queensbury	19	17
Silsden	224	202
Steeton	13	12
Thornton	43	39
Local Growth Centres	599	539

APPENDIX 1 – A COMPARISON OF HOUSING TARGETS AND DSIRIBUTION – CURRENT DRAFT PLAN, BASELINE, CSPR AND ADOPTED CORE STRATEGY

	Draft Local Plan – Feb 2021 – Preferred Option		Draft Local Plan – Baseline Pop Proportionate Distribution		CSPR – July 2019		Adopted Core Strategy	
Plan Period	2020 to 2038		2020 to 2038		2020 to 2037		2013 to 2030	
Housing Requirement *	27,672		27,672		26,150		42,100	
	No	%	No	%	No	%	No	%
Bradford City Centre*	7,000	25.3	525	1.9	4,000	15.3	3,500	8.3
Shipley & Canal Road Corridor	1,750	6.3	163	0.6	2,400	9.2	3,100	7.4
Bradford NE	1,850	6.7	4,870	17.6	2,000	7.6	4,400	10.5
Bradford SE	2,200	8.0	3,229	11.7	3,100	11.9	6,000	14.3
Bradford SW	3,175	11.5	5,046	18.2	3,500	13.4	5,500	13.1
Bradford NW	2,900	10.5	4,043	14.6	3,100	11.5	4,500	10.7
Shipley	1,200	4.3	982	3.5	400	1.5	750	1.8
Regional City	20,075	72.5	18,859	68.2	18,400	70.4	27,750	65.9
Bingley	850	3.1	940	3.4	800	3.1	1,400	3.3
Ilkley	300	1.1	756	2.7	500	1.9	1,000	2.4
Keighley	2,200	8.0	2,602	9.4	2,800	10.7	4,500	10.7
Principal Towns	3,350	12.1	4,229	15.5	4,100	15.7	6,900	16.4
Burley in Wharfedale	625	2.3	326	1.2	550	2.1	700	1.7
Menston	350	1.3	228	0.8	300	1.1	600	1.4
Queensbury	450	1.6	485	1.8	300	1.1	1,000	2.4
Silsden	700	2.5	405	1.5	800	3.1	1,200	2.9
Steeton with Eastburn	175	0.6	252	0.9	150	0.6	700	1.7
Thornton	575	2.1	310	1.1	500	1.9	700	1.7
Local Growth Centres	2,875	10.4	2,006	7.2	2,600	9.9	4,900	11.6
Addingham	175	0.6	164	0.6	75	0.3	200	0.5

Baildon	250	0.9	820	3.0	250	1.0	350	0.8
Cottingley	150	0.5	259	0.9	0	0.0	200	0.5
Cullingworth	175	0.6	155	0.6	150	0.6	350	0.8
Denholme	80	0.3	149	0.5	200	0.8	350	0.8
East Morton	10	0.0	66	0.2	0	0.0	100	0.2
Harden	60	0.2	79	0.3	25	0.1	100	0.2
Haworth	250	0.9	330	1.2	275	1.1	400	1.0
Oakworth	75	0.3	187	0.7	0	0.0	200	0.5
Oxenhope	25	0.1	101	0.4	25	0.1	100	0.2
Wilsden	125	0.5	198	0.7	50	0.2	200	0.5
Local Service Centres	1,375	5.0	2,509	9.1	1,050	4.0	2,550	6.1

Notes:

- Housing Requirement quoted is the number of new homes for land needs to be provided i.e. after any allowance for windfall, clearance ETC.
- Bradford City Centre is a slightly expanded area including the southern gateway in the current draft plan compared to previous plans;
- Other boundary changes also make direct comparisons more complex – in particular changes to the Shipley and Canal Road corridor area boundaries.