

**BRADFORD STRATEGIC HOUSING LAND  
AVAILABILITY ASSESSMENT (SHLAA)**

**APPENDIX 2:**

**SCHEDULE OF COMMENTS ON SHLAA  
METHODOLOGY CONSULTATION**

**Q1. How should the SHLAA Working Group be constituted and who should be on it?**

<p><b>Barton Wilmore</b></p>	<p>Wainhomes strongly supports a partnership approach to the Bradford Strategic Housing Land Availability Assessment. The Government’s Strategic Housing Land Availability Assessments Practice Guidance 2007 advises that a partnership approach is essential to ensure a joined up and robust approach, and considers that partners can bring essential expertise and knowledge to the process.</p> <p>The Government’s Practice Guidance advises that key stakeholders should include:</p> <ul style="list-style-type: none"> <li>• House builders;</li> <li>• Social landlords;</li> <li>• Local property agents;</li> <li>• Local communities; and</li> <li>• Other agencies e.g. English Partnerships.</li> </ul> <p>To ensure an effective partnership Bradford Council should ensure that representatives from the above types of stakeholders are included in the process.</p>	<p>The Council agrees with the comments made and will be seeking to ensure as far as possible the approach advocated.</p>
<p><b>Bradford Centre Regeneration</b></p>	<p>No comments are offered on the composition of the Working Group. However BCR requests further details on how the Working Group will consult with wider interest groups throughout the process, especially on how the Council and RDA owned land allocated to the BCR programme will be taken into consideration.</p>	<p>The Council will follow the CLG best practice guidance with regard to the preparation of the SHLAA and this will involve consulting on the draft SHLAA report. Also it is and has been open to any agency including BCR and the RDA to submit comments on prospective sites through the Call For Sites process.</p>
<p><b>Persimmon Homes Yorkshire</b></p>	<p>Persimmon would like to express an interest in joining the SHLAA Working Group.</p>	<p>The offer is noted and welcomed.</p>
<p><b>Sanderson Weatherall</b></p>	<p>The proposals for representation by a number of stakeholders on the Working Group is supported. However it is important that the process of selection of members is transparent and that details of the members of the group are made public.</p>	<p>The comments are noted.</p>
<p><b>Turley Associates on behalf of Fox Land and Property.</b></p>	<p>The concept of a Working Group is welcomed. It is, however, considered that the group should be represented by more than just one local house builder. Housing delivery will be driven, very substantially, by private sector house builders. To ensure a robust assessment and avoid potential conflicts of interest it is imperative that a number of house builders and developers are included in the Working Group. The experience of local house builders will differ and in turn the experience of local house builders is bound to be different to that of national representatives, particularly in the current economic climate. It is vital to have a number of views from the same industry. In addition, depending on the size of the local house builders, they may not be able to fully appreciate the complexities of some of the larger site’s being considered by the City Council in its SHLAA.</p>	<p>The comments are accepted and as far as possible the Council will try to secure a number of different types of house builders on the Working Group.</p>

**Q2. What should be the role of the SHLAA Working Group, and how should it contribute to a robust study?**

<p><b>Barton Wilmore</b></p>	<p>The Governments guidance on Strategic Housing Market Assessments (2007) which is referred to in the Governments SHLAA practice guidance states that the responsibilities of the working groups could include:</p> <ul style="list-style-type: none"> <li>• Sharing and pooling information and intelligence, including relevant contextual intelligence and policy information</li> <li>• Assisting with the development of a project plan for undertaking the housing market assessment and ensuring its findings are regularly reviewed;</li> <li>• Supporting core members in the analysis and interpretation of housing market intelligence; and</li> <li>• Considering the implications of the assessment, including signing off the assessment report, the core outputs and agreeing follow-up actions.’</li> </ul> <p>It is important that partners are targeted that can provide the skills that may be lacking within Bradford Council. For as example, as stated in the practice guidance house builders and local property agents can advise the Council on how market conditions can affect economic viability.</p>	<p>The Council broadly agrees with these comments.</p>
<p><b>Turley Associates on behalf of Fox Land and Property.</b></p>	<p>It is likely that the SHLAA will comprise a significant number of housing sites. It is, therefore, considered unrealistic for the Working Group to be involved at every stage. It is my view that the role of the Working Group should be twofold. The Working Group should scrutinise the Council’s views on the suitability and availability of sites, but focus the majority of their time on the achievability stage. Council Officers should deal with suitability and availability, and ultimately decide which sites should be put forward as potential housing allocations.</p>	<p>This approach accords with the initial ideas of the Council, however the role of the Working Group will of course need to be discussed and agreed with its members in due course.</p>

**Q3. How should the site appraisal work be organized and what role should the non council Working Group members play?**

<p><b>Barton Wilmore</b></p>	<p>It is impossible for all Working Group members to visit all sites. We suggest that a pro-forma for site bids is agreed by the Working Group to obtain sufficient and relevant information from land owners, and that the Working Group take an overview role and agree a scoring matrix. Based on this information they can then visit a small sample of sites.</p>	<p>The Council notes the comments. Working Group members will need to assess how best they can use their own limited time and resources to best effect in making the SHLAA and its analyses as robust as possible.</p>
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**Q4. Do you agree with the proposals for updating the SHLAA in 2009?**

<p><b>Barton Wilmore</b></p>	<p>As Government Practice Guidance (2007) suggests the SHLAA should not be a one-off process and updating it should be done annually. An annual review would ensure that the information is kept up to date, and would enable the Council to ensure they</p>	<p>The comments are noted.</p>
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	<p>have a five year land supply and that they are on course to meet the housing targets set by the RSS.</p> <p>A key aspect of this is reviewing the level of ‘commitments’ and sites with ‘planning permission’ to ensure that such sites are actually contributing to the five year supply.</p>	
<b>GVA Grimley on behalf of Giggleswick School</b>	<p>Government policy set out within PPS3 requires Local Planning Authorities (LPA’s) to undertake an annual review of its SHLAA. Whilst this process will not necessarily comprise a re-run of the whole consultation process, it will present the opportunity to update the planning status of individual sites, and incorporate the details of any new sites which may come forward for housing since the study first commenced. This process will also be important in providing an up-to-date picture of housing land supply across the District.</p>	The Council notes and agrees with the comments.
<b>Turley Associates on behalf of Fox Land and Property.</b>	<p>Given the work involved it would seem unlikely that the SHLAA update would be available before April 2009. However, I am firmly of the view that the time lag between the Council’s Housing Monitoring Report 2007 and the SHLAA update in April 2009 is too excessive. It is clear that some housing monitoring work has been undertaken as the Council’s Phase 2 housing sites have recently been released. This could not have been done without knowing the current supply position. I am of the view that the Council should issue an update as a priority so as not to harm the supply of housing land in Borough. I appreciate that this would not be PPS3 compliant at this stage. It would, however, suffice, subject to further scrutiny where necessary, until the SHLAA results are made available next year.</p>	The comments are noted.
<b>Q5. How can the quality and transparency of the SHLAA be best assured?</b>		
<b>Barton Wilmore</b>	<p>PS12: Local Spatial Planning advises that LDF documents should be based on a thorough evidence base that contains two elements:</p> <ul style="list-style-type: none"> <li>• <i>‘Participation:</i> evidence of the views of the local community and others who have a stake in the future of the area.</li> <li>• <i>Research/fact finding:</i> Evidence that the choices made by the plan are backed up by the background facts.’ (PPS12: Paragraph 4.37)</li> </ul> <p>We also consider it appropriate that the Council’s data on commitments and completions id made available, and a clear list of sites that make up the 5 year supply is published. If this can be demonstrated throughout the SHLAA process then</p>	The comments are noted.

	Wainhomes considers that this will ensure the quality and transparency of the SHLAA.	
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**Q6. Is the timetable for completion of the SHLAA (see Appendix 3) realistic and how can it be assured?**

<b>Barton Wilmore</b>	<p>The timetable does not allot any time for taking into consideration the feedback from this consultation, choosing the members of the Working Group and nor does it timetable any meetings of the Working Group. The time it takes for these things to take place may mean that the timetable outlined in Appendix 3 could be delayed, and to avoid this they should be included in the timetable from the outset.</p> <p>The SHLAA methodology states that the composition of the Working Group is yet to be decided, however the timetable states that ‘determining which sources of sites will be included in the assessment’ and ‘determining which sites and areas will be surveyed’ have already been decided, or are currently being decided. Practice guidance states that these decisions should be justified and agreed by the members of the Working Group, the timetable should therefore be revised to reflect this.</p> <p>The SHLAA forms part of the LDF evidence base, it is from the SHLAA that the LDF documents will be based. We therefore consider that the SHLAA timetable should be consolidated into 6 months to ensure that it does not impact on the production of the LDF.</p>	<p>The comments on the timetable are noted. A revised timetable which includes the programming of Working Group meetings and inputs will be discussed with the Working Group at its inception.</p> <p>The SHLAA Methodology Framework seeks views on these matters via questions 7 and 8 and the responses will be taken into account and discussed with the Working Group as necessary to determine whether any changes in approach need to be made. The Council considers that its broad approach on these matters is comprehensive and robust and also reflects the reality of resources available to Bradford’s Planning Service.</p>
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<b>GVA Grimley on behalf of Giggleswick School</b>	The achievability of the draft timetable will be dependent upon two factors; (a) the availability of internal resources at the Council; and (b) the number of sites put forward during the Council’s ‘Call for Sites’ exercise. On first review however, we can confirm our general acceptance of the timetable.	The comments are noted. However the timetable will have to be reviewed and agreed by the SHLAA Working Group.
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**Q7. What sources of sites should be tapped to ensure the SHLAA is robust?**

<b>Barton Wilmore</b>	<p>Figure 4 of the CLG’s Practice Guidance set a list of opportunities to explore the following are identified in the practice guidance but are not included in table 2 of the Council’s draft methodology:</p> <ul style="list-style-type: none"> <li>• Vacant and derelict land and buildings;</li> <li>• Land in non-residential use suitable for redevelopment; and</li> <li>• Sites in rural settlements.</li> </ul> <p>The draft methodology at page 13 mentions that the above sources will be included in the SHLAA but this is not followed through by inclusion in table 2. This is confusing and for clarity the Council should include all sources of sites listed in the</p>	<p>The Council can confirm that the types of site listed here are included in the SHLAA – paragraphs 3.1 to 3.7 of the consultation document state that the only source mentioned in the CLG guidance not currently expected to be part of Bradford’s SHLAA is new free standing settlements.</p> <p>Table 2 of the SHLAA consultation should not be compared to figure 4 of the CLG guidance because it is not listing the CLG site types but the datasets and sources the Council holds which will provide sites of the different types mentioned by the CLG.</p>
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	text in table 2.	
<b>Bradford Centre Regeneration</b>	In addition to a comprehensive schedule of existing sites with planning permission (City Centre Living Schedule compiled with Planning), BCR can assist in giving up to date information on potential developments and advise on sites likely to fall out of contention as housing sites in favour of alternative uses.	The comments and offer of information and advice is welcomed.
<b>GVA Grimley on behalf of Giggleswick School</b>	To fully understand housing capacity across the District, GVA Grimley strongly advocates the consideration of all sources of sites within the assessment. This include all categories listed within Table 2. Given the scale of housing growth projected for Bradford in the recently adopted Yorkshire and Humber RSS (50,000 dwellings over the next 20 years), the SHLAA should include as wide a selection of sites and locations as possible to achieve these targets, and to support projected economic growth and demographical changes to the population.	The comments are noted and concurred with.
<b>Natural England</b>	There may be regeneration of degraded housing stock in Bradford and, if this is ensuring that currently unoccupied housing is brought back into use, it will be contributing to housing availability and could therefore be include in the SHLAA. This would help take pressure off green field sites elsewhere.	The comments are noted.
<b>Turley Associates on behalf of Fox Land and Property.</b>	The list of sites included in Table 2 is considered to be a robust source of potential sources. However, UDP Allocated Safeguarded Land should be considered within the category of 'Sites With Planning Status'. Safeguarded Land is already identified in the UDP as suitable potential housing sites and have been considered by an Inspector.	The Council disagrees with this for a number of reasons. Firstly the policy linked to safeguarded land is to preserve them in their current use – i.e. development would at present be unacceptable and in conflict with the statutory development plan. The need to bring forward safeguarded land must be judged in the different LDF DPD's in the context of the alternative available land supply in each area. The change to a housing allocation would need to be set before the public and stakeholders in the LDF and could be challenged. Current safeguarded land status is therefore not a guarantee that a site will be allocated for housing development in the LDF. Finally only those areas of safeguarded land which were subject to RUDP objections would have been considered by the RUDP Inquiry Inspector and even in the instances where sites were considered favourably by the RUDP Inquiry Inspector there is no certainty that circumstances have not changed and that the same outcome would occur in the future.
<b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b>	The inclusion of all known sites whether greenfield or brownfield is welcomed. With the increased RSS housing target and Bradford's elevation to being a Regional City, the Council should be accepting a range of sites regardless of their size and location at this stage.	The comments are noted.

**Q8. Is the Council right in sourcing sites in all categories except new settlements, and in all settlements in the district regardless of their size?**

<b>Barton Wilmore</b>	Our client considers that it is appropriate to consider the widest spectrum of sites in order to establish which are the most appropriate for housing development and which will be the most sustainable. The widest possible range of sites will ensure the Council has the maximum choice of where to locate housing. This is especially important given the pressure on the Council to deliver new housing, and in light of the RSS target of 4300 new dwellings per annum between 2008-2026. However, we agree that it is unlikely new free standing settlements will be needed.	The Council notes and agrees with these comments but points out that the RSS target for Bradford is 2700 dwellings per annum – it is Leeds which has target of 4300.
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**Q9. How should the SHLAA assess the potential of newly emerging master plans for the remodelling of existing housing estates and should they be considered as sites or broad locations?**

**Q10. How should the potential of broad locations for growth such as Apperley Bridge / Esholt and Holmewood be judged and what are the right criteria and mechanisms for doing so?**

**Q11. At what stage in the SHLAA process should the potential of the Apperley Bridge / Esholt and Holmewood urban extensions be considered?**

<b>Barton Wilmore</b>	It is the purpose of the SHLAA to look at the available land and identify suitable areas for growth, it is these findings that will inform the Core Strategy and broad locations for growth. These are therefore issues that should be dealt with by the Core Strategy rather than the SHLAA.	These questions are essentially seeking views on what stage in the SHLAA process certain expansion areas, already outlined in the Core Strategy consultations, should be assessed and how. The contribution that these areas could make to housing land supply must therefore be considered at some point in the SHLAA. It is not intended that the SHLAA process to identifies new geographical locations for growth..
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<b>Sanderson Weatherall</b>	<p>The proposed timetable and sources of sites to be included in the assessment are generally supported. In particular, the proposal to include the potential locations for growth, such as Apperley Bridge, Esholt and Holmewood in the SHLAA from the outset is supported. It is important to ensure that the SHLAA is consistent with the Core Strategy document.</p> <p>Given the nature of the proposed broad areas identified for urban extensions, it is considered that care should be taken when surveying the sites to consider the overall strategic nature of these sites. Indeed, when considering the Esholt site, the survey should be carried out with regard to the overall vision and Masterplan strategy for the Airedale corridor.</p>	The comments are noted.
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**Q12. What site size threshold should be used for the SHLAA given the need to reflect the resources available to the study – should it be based on site area or site capacity?**

**Q 13. If site capacity is used, is 15 dwellings the right number to distinguish between small and large sites?**

**Q14. Would a threshold of 15 dwellings for building conversions be more suitable than sticking to the 0.4 ha threshold?**

<b>Barton Wilmore</b>	Using site area or capacity is dependent on density, therefore it is tricky to use either approach. However, in order to ensure that a maximum amount of a sites are considered during the SHLAA and to make it comparable with the Council’s Urban	The comments are noted, however the Council disagrees that the same thresholds should be used for the SHLAA as the Urban Capacity Study since the methodologies for these studies and
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	<p>Potential Study the site size threshold should be the same for the SHLAA as the Urban Potential Study which is 0.2ha.</p> <p>If the Council use a pro-forma for site bids it ought to request likely densities and ask land owners to put forward possible densities.</p> <p>The purpose of the SHLAA is to inform the PPS3 5 year housing supply and 11-15 year supply, as such, we do not see the need to identify conversions.</p>	<p>their roles and aims are different. The 0.4 ha threshold relates to that which will be used for allocating sites in the LDF and this therefore both logical and consistent with the focusing of limited resources on the sources which will demonstrate that the LDF can deliver the right amount of new housing development.</p> <p>The Council disagrees with the comment on not including conversions in the 5 year supply. These are a significant source of new development and their exclusion could lead to a significant underestimate of the 5 year supply.</p>
<b>Bradford Centre Regeneration</b>	The use of sites of at least 0.4 ha is probably too crude for the city centre where high densities will be achieved.	The comments are noted.
<b>Dacre, Son &amp; Hartley</b>	In recent discussions with respect to those other SHLAA's we have advocated 0.14 ha threshold as being the most sensible way forward. However we agree with the Council's approach to thresholds in paras 3.9 and 3.10 of the draft methodology.	The support for the proposed approach to thresholds is noted and welcomed.
<b>GVA Grimley on behalf of Giggleswick School</b>	In line with current housing allocations in the UDP, we consider a site size threshold of at least 0.4ha to be appropriate. Applying the measure of site capacity would require further detailed site investigations to be undertaken to calculate site densities, having regard to possible individual site constraints. This would place extra pressure on Council resources, and potentially put the timetable at risk of slippage.	The inclusion of site capacity as part of the threshold would it is admitted place additional burdens of work on the Council and would in any case involve a degree of subjectivity. The matter will however be raised with the Working Group at its inception meeting.
<b>Turley Associates on behalf of Fox Land and Property.</b>	A distinction between small and large sites is supported. A threshold of 15 units is commonly used to apply affordable housing thresholds and as such is considered to be acceptable.	The comments are noted.
<b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b>	The SHLAA should use expected dwelling numbers on a site as the threshold rather than site area. Due to increased densities experienced in recent times, a small site of under 0.4 ha can still provide a meaningful number of dwellings. Furthermore to avoid the use of Green Belt sites for housing development, the development of small sites in urban areas should be welcomed as a priority. If a site size threshold of 15 dwellings is used then many dwellings would not be counted which would lead to the potential reliance on windfalls. It is suggested that a dwelling capacity threshold of 15 dwellings is used.	The proposal to use a dwelling capacity / threshold of 15 rather than 0.4ha will be considered by the Working Group. The draft methodology as published represents a compromise with no threshold being used to for sites as part of the 5 year supply. There is a need to limit the work involved in the SHLAA to that which is necessary for a robust study and to keep the associated work to manageable proportions and given that the LDF will most likely not be allocating sites of less than 0.4ha this seems a reasonable cut off.
<b>Q 15. Which settlements should be included in the SHLAA – is Table 4 Correct?</b>		
<b>Barton Wilmore</b>	For clarity Wainhomes considers that the settlements contained in table 4 should mirror those defined as part of the sub-regional city, principal centres and local	The Council disagrees with this comment for a number of reasons. Firstly the SHLAA cannot be so inflexibly linked to the



	<p>service centres by the emerging Core Strategy because these are the settlements to which the Core Strategy apportions a proportion of the housing target as set by the Regional Spatial Strategy. The Core Strategy does not however, include Riddlesden, as such the SHLAA methodology should justify why this settlement has been chosen.</p>	<p>Core Strategy as the approach within it has yet to be determined. The Core Strategy has not even reached Preferred Options stage yet. Secondly for strategic planning purposes Riddlesden is considered within the RUDP as part of Keighley. That is also the case in the LDF Core Strategy consultations undertaken thus far. Finally Riddlesden is a location which could be considered suitable for site allocation in the LDF and the SHLAA should be including as wide a selection of areas not narrowing it down.</p>
<b>Bradford Centre Regeneration</b>	<p>The survey should include the ‘hotspot’ of the Canal Road Corridor, which should have been picked up as an emerging Masterplan.</p>	<p>The Canal Road area has indeed already been included in the schedule of areas for inclusion in the SHLAA and will be surveyed and assessed accordingly.</p>
<b>GVA Grimley on behalf of Giggleswick School</b>	<p>Table 4 comprises the main settlements across the District. We can therefore confirm our acceptance regarding the inclusion of these settlements.</p>	<p>The comments are noted and welcomed.</p>
<b>Natural England</b>	<p>Section 5: Determining Which Sites and Areas will be Surveyed :</p> <p>While we note the inclusion of green belt sites in the SHLAA, which does not necessarily mean they will be allocated, we would advise that this 1999 review is likely to be relatively out of date. We would prefer to see strategic review of the green belt at the Leeds City Region level before any sites are allocated (and ideally to inform the SHLAA) as the green belt does not simply stop at local authority boundaries. Should any development in the green belt be identified, we would urge that Bradford work with neighbouring authorities to undertake such a study. This may mean that sites that were identified as potentially developable in the 1999 review may have a different level of importance for the green belt when assessed at a strategic level.</p>	<p>Green belt sites will by necessity be included in the SHLAA. The Call For Sites has produced a significant number of green belt proposals. The SHLAA should not automatically discard these sites, however the Working Group will need to consider what role green belt status should play in the suitability test if any.</p> <p>The Council will keep its approach to green belt under review as work on the SHLAA is completed. The SHLAA will help reveal the extent to which green belt releases may be required to meet the RSS housing requirement. There is scope within the RSS for localised reviews of green belt or more strategic reviews involving cross boundary cooperation but it is too early to say what approach will be required.</p> <p>Meanwhile any future identification of green belt land within the LDF will need to comply with both national and regional guidance and will only be considered where other options and sources of supply are insufficient and there are thus exceptional circumstances for such a change.</p>
<b>Sanderson Weatherall</b>	<p>With regard to table 4, it is considered that the table should be expanded to include all settlements, including those currently washed over by green belt. This approach is consistent with table 8 of the methodology which identifies those sites which have been established as a priority for development.</p> <p>The justification for point 1 in Table 8 states that all settlements could be appropriate and sustainable as a result of forthcoming policy in the LDF strategy. As a result it is considered that all settlements should be considered at this stage,</p>	<p>Table 8 and its justification are not meant to imply that settlements washed over in the green belt are included as suitable locations so the text may need amending. These green belt locations have no status within the current RUDP settlement hierarchy and are considered as locations for limited infill only. The only exception would be where there are specific and emerging proposals for growth areas, in which case these locations would automatically be included in the SHLAA.</p>

	specifically those which are in proximity to strategies for potential locations for growth.	
<b>Natural England</b>	<p>Section 6: Carrying out the Survey :</p> <p>Natural England welcome the undertaking of assessment of the character of the surrounding area and would encourage Bradford to base this assessment on Natural England's legacy body, the Countryside Agency, guidance on landscape character. This includes an easy to use site-level field assessment pro forma at <a href="http://www.countryside.gov.uk/images/chapter%205%20LCA_Guidance_tcm2-29983.pdf">http://www.countryside.gov.uk/images/chapter%205%20LCA_Guidance_tcm2-29983.pdf</a> . Broader landscape character information is also available in Bradford's own newly published landscape character SPD.</p> <p>It would also be useful to note down key habitat features (as well as the presence of statutory or local biodiversity and geological sites), and the above link includes such features. This would help rule out the higher value sites in terms of biodiversity. Desktop checks for protected species or UK Priority Habitats may also help identify further constraints (for instance, through a local record centre, e.g. West Yorkshire Ecology). While in many cases the presence of a protected species may be mitigatable, where significant interest can neither be mitigated nor compensated for, PPS9 states planning permission should be refused. It would therefore be useful to identify such constraints at an early opportunity.</p> <p>We would also recommend that the desktop assessment assess surrounding habitat or significant populations of species to determine whether important biodiversity features might have connectivity between them that would be compromised by allocating a housing site (for instance, a habitat such as an ancient woodland may be degraded by detachment from other woodlands). While in many cases a habitat network can be accommodated within development, this is not always the case, so early assessment of this constraint is advisable. Natural England's website features downloadable maps of habitat networks which may help identify key networks (<a href="http://www.english-nature.org.uk/pubs/gis/gis_register.asp">http://www.english-nature.org.uk/pubs/gis/gis_register.asp</a> ), and checks with the local record centre may reveal important populations of species.</p>	<p>The Council notes the advice and will consider how best to incorporate wildlife and habitat issues in the study. However much of the analysis mentioned would be inappropriate for a SHLAA which operates at a strategic level, and would be instead be more appropriate for LDF Allocations DPD's.</p>
<p><b>Q17. What would be the best approach to assess the potential of each site e.g. sketching schemes for each site from scratch, using sample schemes, or density multipliers?</b></p> <p><b>Q18. If density multipliers are used, what would be the most realistic densities to use? Should they be based on planning policy, an analysis of actual developments or both?</b></p>		
<b>English Heritage</b>	Paragraph 7.5 - We support the proposal to reality check the assessed yield from potential housing sites and welcome the need to reassess the figures against the potential constraints posed by the need to safeguard the character of the district's	The comments are noted.

	historic assets.	
<b>Barton Wilmore</b>	<p>The government's SHLAA practice guidance advises that housing potential should be guided by existing or emerging plan policy, however the SHLAA makes no reference to this. As you are aware the Bradford UDP was adopted in 2005 and so could still be considered relevant and in addition Bradford have an emerging Core Strategy. However, these documents are not referred to in the SHLAA methodology.</p> <p>Our client considers that density multipliers are the most suitable option, using 50 dph for urban areas, 40 dph for suburban areas and 35 dph for greenfield sites. However, for very large sites it may be appropriate for developers to submit illustrative layouts.</p>	<p>The Council considers that current RUDP policy has some relevance in determining the density assumptions used in the SHLAA but only if these are consistent with what can be delivered given local circumstances and evidence of recent development patterns will assist to some extent.</p> <p>The Council agrees that density multipliers are the most appropriate methodology for the SHLAA but will need to counsel the views of the SHLAA Working Group on this matter and on what figures should be used if multipliers are applied.</p>
<b>Bradford Centre Regeneration</b>	In practice recent approved schemes in the City Centre have achieved higher densities than those suggested in the methodology. The City Centre design Guide suggest a range for the City Centre of between 100-250 units per hectare. BCR suggests that perhaps a figure towards the upper end of the City Centre design Guide is a more realistic estimate of potential capacity.	The comments are noted and will be passed on to the SHLAA Working Group.
<b>GVA Grimley on behalf of Giggleswick School</b>	Previous experience has found density multipliers to provide a relatively accurate reflection of site capacity. Clearly however, there may be the opportunity to accommodate additional dwellings on an individual site basis subject to undertaking more detailed investigations. This work would form part of any future planning application(s) submission. As such, the number of dwellings which could be accommodated across any one site should at this stage be treated as indicative only.	The comments are noted and welcomed.
<b>GVA Grimley on behalf of Giggleswick School</b>	<p>The Replacement UDP, as part of the Development Plan, establishes the current statutory planning policy framework for the District. In accordance with its provisions, densities between 30 and 50 dwellings per hectare should be applied, with a judgement made on an individual site basis having regard to locational factors including:</p> <p>Accessibility to the local highway network;  Accessibility to the public transport network;  Site surroundings; and  Any significant site allocations i.e. Conservation Area.</p>	The comment are noted. The most appropriate densities will be considered by the Working Group and informed by both policy and recently completed schemes.
<b>Sanderson Weatherall</b>	The use of density multipliers is considered the most appropriate approach to assess the potential of sites. Densities to be used should be based on both planning policy and actual development. The existing urban capacity density multipliers are considered high and we support proposals for a new set of multipliers based on up to date information to be defined. We would welcome a further opportunity to comment on the newly defined multipliers. The application of a reality check to	The comments are noted.

	amend potential yield subject to specific site characteristics is supported although it is important that this process is transparent.	
<b>Turley Associates on behalf of Fox Land and Property.</b>	Whilst I fully appreciate the time involved in assessing the potential yield from each site I believe that the use of density multipliers only produces theoretical capacities which are often far higher than would be delivered in reality. Given that PPS3 recommends that LPAs provide a robust evidence base for its LDFs it would seem illogical to go to the extent of analysing each site in detail, only then to apply density multipliers which are subject to challenge on a site by site basis. As a consequence I am of the view that each site should be assessed to ensure that the potential yield is as accurate as possible.	Whilst density multipliers are not perfect there is no guarantee that judgements made at the time of the SHLAA process in sketching schemes for each site would be borne out by the eventual proposals put forward and implemented. Design led solutions in the Council's view give a false and misleading impression of technical validity and soak up immense amounts of resources. It is doubtful that any modest gains in accuracy derived by using design solution would justify the additional resources required. Finally it is accepted that density multipliers are sometimes set too high and therefore a cautious approach to the expected yields would avoid this problem.
<b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b>	The new density multipliers being devised are welcomed as this will provide a bit more certainty to projected housing completions than a blanket density level across the district that s likely to be achieved.	The comments are noted.
<b>Q19. Is it worth calculating net developable areas for each site and if so are the rules of thumb identified in this paper appropriate? Of not these then which should be used?</b>		
<b>Barton Wilmore</b>	Wainhomes agrees with the net developable areas as shown in Table 6 of the draft SHLAA methodology.	The comments are noted.
<b>Natural England</b>	Natural England welcomes 'Table 6: Net Developable Areas – Possible Rules of Thumb' but would urge Bradford to ensure that the developable area accommodates provision for green infrastructure. Natural England promote the ANGSt standard of 2 ha of natural green space per 1000 population, and has also been working with Jane Scott at Bradford to map green infrastructure provision. We would welcome an approach that factored in green infrastructure provision.	The comments are noted and will be re-laid to the SHLAA Working Group for their consideration.
<b>Q20. How should the potential of large conversions be determined?</b>		
<b>Barton Wilmore</b>	The use of the term 'large conversion' implies Mill type buildings/large groups of buildings. The potential of these types of sites should be determined through site area and proposed density.	The comments are noted.
<b>Q 21. What approach and criteria should be used to gauge the suitability of sites?</b>		
<b>Barton Wilmore</b>	There is nothing within the SHLAA methodology that picks up sustainability. The distance of a site from key services (i.e. its sustainability) is a very important aspect in the determination of a sites suitability. The Working Group should work up	It is not correct to say that the approach to suitability outlined in the SHLAA has nothing that picks up sustainability. The first 2 points within table 8 of the consultation document seek to

	<p>criteria to give guidance on the appropriate distance from each of the key services such as: primary school, doctors surgery, shops, bus stop, train station etc.</p> <p>It would be useful to indicate distance rings around each service on a map of each settlement which will enable the group to see if a site falls into the relevant catchment.</p>	<p>identify suitable sustainable locations for development which encompass sustainability principles.</p> <p>There is nothing in the CLG practice guidance (para 37-8) to suggest that SHLAA must include detailed criteria and standards relating to accessibility to services. It is thus fair to say that at present the consultation methodology does not include such criteria.</p> <p>It is critical to understand that the SHLAA is a <b>strategic</b> document and not a tool to determine the <b>relative</b> sustainability of different sites – the data collected and analysis undertaken by the SHLAA must remain strategic and not stray into areas which are effectively determining which sites are the most sustainable as well as whether they are suitable and sustainable per se. The SHLAA has a role in determining when a site is in a sustainable location but it does not have a role in determining what sort of locations and sites within settlements are the most sustainable. This more detailed work will be undertaken in assessing potential allocations in the Site specific DPD's.</p>
<b>English Heritage</b>	<p>PPG16 makes it clear there is a presumption in favour of the physical preservation in situ of Scheduled Monuments and nationally important archaeological sites and their settings.</p> <p>We therefore consider Scheduled Monuments to the type of 'clear cut designation' referred to in paragraph 21 of the SHLAA practice guidance. Any site which would be likely to have an adverse impact on such a site should be excluded from the assessment as a potential location for housing development.</p>	<p>The comments are noted and will be considered by the SHLAA Working Group.</p>
<b>English Heritage</b>	<p>The development of housing on that part of the Registered battlefield at Adwalton which lies in the district would appear to be incompatible with safeguarding its character. Consequently we consider that any site lying within the Registered battlefield itself (which we would regard as one of the 'clear cut designations' referred to in paragraph 21 of the SHLAA practice guidance) should be excluded from the assessment as a potential housing site.</p>	<p>The comments are noted and will be considered by the SHLAA Working Group.</p>
<b>English Heritage</b>	<p>Paragraph 8.4 - Given the nature of the World Heritage Site at Saltaire, and the UK commitment to safeguard its outstanding universal value, it is likely that the amount of new development within the World Heritage Site is likely to be extremely limited.</p> <p>This could make the World heritage Site a 'clear cut designation' in which case sites within this area should be excluded from the assessment as potential locations for housing. If it is not intended to exclude the World heritage Site, it is certainly one of</p>	<p>It is not considered that the World Heritage Site is a designation which would rule out development and therefore be a 'clear cut designation'. The World Heritage designation is not one which aims to prevent all development but which seeks to influence the form of development such that the intrinsic qualities of the area are not harmed. Furthermore the SHLAA cannot prejudge the form and design of development which will be proposed on a site</p>

	<p>the areas which should be identified in Table 7.</p>	<p>by site basis which would be necessary if any sensible judgement over the impact and therefore suitability of a proposal was to be undertaken.</p> <p>Consideration will be given to adding the World Heritage Site designation to table 7. However Table 7 is not intended to include designations which affect the form of development but to include those designations which could prevent development taking place at all.</p>
<p><b>Sanderson Weatherall</b></p>	<p>With regard to table 8 we would make the following comments:</p> <p>The table makes no reference to whether a site is greenfield or brownfield, in accordance with national and regional policy which seeks to maximise the potential of brownfield sites, this issue should be considered when assessing a site's suitability.</p> <p>Point 1 refers to sites complying with national and regional policy on the location of housing. As referred to in the justification, it is important for this criteria to be applied in relation to forthcoming local policies and strategy in the LDF.</p> <p>Point 2 refers to sites providing a suitable living environment for residents in accordance with PPS1 and PPS3 which aim to create high quality new housing which contributes to the creation of mixed and sustainable communities. While it is important to comply with the objectives of national guidance, care is required at this early stage in applying this criterion. Indeed as is stated in PPS3 it is good design which contributes positively to making places better for people and therefore this criteria cannot be fully applied at this stage in assessing a sites suitability for housing.</p>	<p>The Council disagrees with this comment. A site's status as greenfield or PDL does not determine its suitability. Such a status may influence the merits of allocating one site compared to another but this comparative process should take place in the preparation of LDF documents not in the SHLAA. The SHLAA must not rule out or narrow the choice of sites unnecessarily and decisions about whether greenfield land should be identified in the LDF can only be taken in the context of the extent and make up of available land in each area. Once the SHLAA process has been completed the Council will be in a position to put forward a land supply which is both deliverable and which maximises the use of brownfield land in line with national and regional policy.</p> <p>The SHLAA needs to take account of emerging LDF policies on the location of new development but the drivers for suitability must in the main relate to national and regional guidelines since the LDF is at an early stage in its production and the Core Strategy has yet to reach preferred options stage.</p> <p>There is some logic to these comments therefore the application of this criteria is should be strategic – i.e. sites which would be considered to be likely to provide unsuitable living environments would only be those where surrounding conditions and land uses by virtue of noise, pollution, hazards etc render them unsuitable.</p> <p>It is acknowledged that it will be impracticable to investigate in detail all aspects covered by physical conditions for each site.</p>

	Point 3 refers to sites having no major physical constraints. It is considered that the application of this criteria is impracticable at this stage. In the majority of cases it is difficult to judge the physical constraints of a site, particularly in relation to ground conditions, pollution, or contamination without intrusive investigations on site. It is unlikely that land owners will wish to commit to such investigations at this stage, and it is therefore unlikely that the Authority will be able to apply the criteria correctly or judge the physical constraints from a site survey. Indeed should a site be subject to physical constraints appropriate mitigation measures can be applied to overcome identified issues and enable appropriate development.	This issue will therefore be referred to the SHLAA Working Group for consideration. The test should be applied broadly so that those sites which could be subject to mitigation or design solutions are not discarded. However where data is available, either from the site owner / developer via the call for sites, or via desktop analysis of known constraints should as contaminated land, landfill, polluting processes this should be made available to the Working Group so that they can take this into account in determining both suitability and likelihood of delivery.
<b>Turley Associates on behalf of Fox Land and Property.</b>	Table 8 seeks to classify the suitability of sites. In using the criteria based approach it is assumed that sites with planning permission for housing or allocated for housing are suitable. The next source to be considered comprise sites that are subject to local policy constraints. It is considered that 'safeguarded land' should be referred to as the second most suitable sites for potential housing land not sites with local policy constraints, as they are already identified in the UDP as suitable potential housing sites and have been considered by an Inspector. Table 8 should be amended to include this potential and important housing source.	The Council disagrees with this suggestion for the reasons set out in the response to the comment above.
<b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b>	The availability and achievability test is considered to be a reasonable approach	The supporting comment is noted and welcomed.
<b>Q 22. Should local policy designations and constraints be used to determine site suitability?</b>		
<b>Barton Wilmore</b>	To ensure that the SHLAA is robust the Council should take account of the CLG guidance paragraph 38 and also consider sustainability.	The comments are noted. The suitability criteria outlined in the consultation methodology do follow the CLG guidance referred to.
<b>Burley Parish Council</b>	The Parish Council wishes to express its concern at the implications of Section 8, in which areas listed in table 7 of RUDP designations are included in Table 8 – as Suitable but with Local Policy Constraints, and as such are eligible for inclusion as developable in years 6-15. This implies that village green spaces, allotments and green belt land adjoining an existing settlement will not necessarily be protected and this could include wildlife sites or wildlife corridors.	Government Guidance is clear that the role of the SHLAA is not to consider or establish whether sites should continue to be protected under local environmental designations. Inclusion of such sites in the SHLAA does not determines whether they will be identified for development or whether a particular local designation should be retained. It merely establishes whether the would be developable if selected. The whole point of including a notation of 'Suitable but with Local Policy constraints' is to be clear about elements of the potential supply which in fact may not be appropriate for LDF allocation. This allows clear choices to be made and the implications of those choices t be apparent.

<b>English Heritage</b>	A number of assets which are likely to fall within the provisions of Table 7 are actually protected by national policy (e.g. listed buildings) – they are therefore more than just local policy constraints.	The comment is noted however the point of table 7 is to separate those designations which in Government best practice terms would automatically rule out development from those which would not. Listed building status for example does not in any way rule out development. Consideration could be given to using an alternative term to ‘local policy constraints’ to aide clarity.
<b>GVA Grimley on behalf of Giggleswick School</b>	Clearly, a degree of weight should be afforded to Development Plan policies in determining site suitability, particularly as any one site could be subject to one or more designations which alone may realistically rule out the potential for residential development. However, each individual site should also be viewed in the context of the District’s future housing requirements. Therefore, whilst a site may currently be subject to a restrictive policy allocation i.e. Green Belt, this should not necessarily prevent its allocation for housing in the forthcoming LDF where it satisfies points 1 to 4 of Table 8, and where there is a demonstrable need for new residential development within its location. Overall, the framework set out in tables 7 and 8 would appear to represent a logical approach in assessing site suitability.	The comments are noted and welcomed.
<b>Natural England</b>	Natural England recognises the need to follow national and regional guidance on assessing site suitability but agrees that there would be benefit in allowing LDF inspectors to examine ‘policy on / policy off’ scenarios as this would enable factors such as local wildlife sites and best and most versatile land to be considered alongside national constraints to help prioritise the most deliverable sites.	The Council notes and agrees with the comments.
<b>Sanderson Weatherall</b>	Point 4 in table 8 – specifically with reference to criteria D on local policy constraints – should have regard to other background evidence such as open space assessments to consider if specific policy constraints could be overcome in the short term which would therefore make a site suitable now rather than suitable at a future point.	This is not considered appropriate. Open space assessments are technical studies and the SHLAA cannot pre judge the policy decisions which will be made in the future by the Council to either re-affirm remove or modify a local policy designation. Separating sites out which have no such current policy constraints allows a more robust assessment of the 5 year supply of deliverable sites since there is more certainty over the planning policy acceptability of these sites.
<b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b>	While it is sensible for the SHLAA to identify how much land is available for housing development with no policy constraints, it is also necessary to show the amount of land which is affected by current policy constraints e.g. urban greenspace. The use of the ‘policy on’ policy off’ procedure is therefore supported. The Council could take this further by prioritising current constraints such as releasing urban greenspace before Green Belt.	The comments are noted.  It is not considered possible or appropriate to prioritise one whole block of land ahead of another purely because of its designation. The value of the piece of land, whether it be as open space or green belt needs individual assessment as part of the LDF process and outside of the SHLAA.
<b>Q 24. What is your view on the approach set out in tables 7 &amp; 8?</b>		
<b>Barton Wilmore</b>	Wainhomes considers that the approach set out in table 7 and 8 is over complicated	The Council’s comments with regards to sustainability are set out



	and misses out criteria regarding accessibility/sustainability criteria as outlined in our response to question 21.	above.
<b>Turley Associates on behalf of Fox Land and Property.</b>	The approach defined in Tables 7 & 8 seems appropriate and robust.	The comment is noted and welcomed.
<b>Q 25. What level of evidence and information is required to demonstrate that a site is available for housing development?</b>		
<b>Barton Wilmore</b>	Our client considers that comments from the landowner should be taken into account, along with any existing planning permission and development plan allocations.	The comments are noted.
<b>GVA Grimley on behalf of Giggleswick School</b>	<p>Q25-28. :</p> <p>Site availability will be dependant upon a number of important factors, as follows:</p> <p>Land ownership, including any known ownership constraints i.e. ransom strips, multiple ownership;  Any extant planning permission across a site;  Any emerging proposals for a site;  Landowners willingness to release a site for development, and the time period for doing so; and  Any existing/long-term tenancy agreements.</p> <p>Evidently, the availability of a particular site will have a significant bearing on when it may be programmed to come forward for development. In order for a site to form part of the Council's initial 5-year supply, we consider that each of the above factors should be known. Where this information is unavailable or uncertain, then sites of this nature should only be treated as medium to long-term development opportunities.</p>	The comments and proposed approach, particularly with regard to the 5 year supply, appear broadly in line with the proposed approach set out in the draft methodology.
<b>Q 26. What methods and criteria should be used to assess availability?</b>		
<b>Barton Wilmore</b>	Wainhomes considers that the approach detailed in Table 9 is appropriate for assessing whether a site is available for housing development	The comment is noted.
<b>Q 27. What part should availability factors play in assigning sites to the different time periods/phases of the study?</b>		
<b>Barton Wilmore</b>	Paragraph 54 of PPS3: Housing advises that Local Planning Authorities should identify sufficient deliverable sites and to be considered deliverable they should be; available, suitable and achievable. Given the importance placed here on availability this should be an important factor which considering periods/phases of the study. To	The Council agrees that availability is a key element of deliverability within the context of the 5 year supply.

	ensure a deliverable five year land supply the Council should prioritise those sites which are available now.	
<b>Q 28. If ownership or owner intentions and thus availability is unknown or uncertain how should this affect the site's inclusion or exclusion from the supply?</b>		
<b>Barton Wilmore</b>	Where availability is unknown or uncertain these sites should have a lower priority than those which are available now. As stated above to maintain a deliverable five year land supply the Council should priorities those sites which are available now.	The comments are noted.
<b>Turley Associates on behalf of Fox Land and Property.</b>	One of the key changes to the production of local policy has been the provision of a robust evidence base by LPAs to inform the preparation of LDFs. I am firmly of the view that a site should not be included in the SHLAA, and certainly not with the Council's 5 year housing land supply calculation, if the intentions of the landowner are unknown. One of the key tests outlined para. 54 of PPS3 is 'availability' which can only be ascertained from the landowner or via a potential developer. Without this information it is considered that a Council's evidence base would be fundamentally flawed. I believe that the purpose of the new housing land analysis procedures is to provide transparency and thus, remove the need to make assumptions which are often contested on a site by site basis at development plan inquiries. This approach will inevitably result in the removal of a significant amount of windfall sites identified through the Council's Urban Capacity Study. This however, is considered to be the correct approach given that the ultimate objective is to provide a robust evidence base.	It is agreed tat site where ownership intentions are unknown or unclear cannot be considered as part of the 5 year supply of deliverable sites where certainty over the prospects of delivery is essential. However it may be appropriate to include these sites in some part of the supply in the medium and longer term, as suggested by several the respondents to this consultation. This issue will be referred to the SHLAA Working Group for its consideration.
<b>Q 29. Does Table 9 form an appropriate basis for considering availability in the SHLAA?</b>		
<b>Barton Wilmore</b>	As stated above Wainhomes considers that the approach detailed in Table 9 is appropriate for assessing whether a site is available for housing development.	The comments are noted.
<b>Q 30. What factors should be used to judge achievability and which of those set out by Government are most important?</b> <b>Q31. What methodology should be used to ascertain achievability?</b>		
<b>Barton Wilmore</b>	The draft methodology follows the practice guidance regarding the achievability test, and in this regard Wainhomes supports the Councils approach.	The supporting comments are note and welcomed.
<b>Bradford Centre Regeneration</b>	BCR will be able to supply evidence to gauge the suitability of sites and assess availability and the market, cost and delivery factors through its detailed knowledge of developers and agent operating in the city.	The comments and offer of advice are welcomed.
<b>GVA Grimley on behalf of Giggleswick School</b>	Given the current economic climate and deteriorating housing market conditions, the delivery of new housing will be highly dependant upon the economic viability of	The comments are noted.

	any one scheme. The three categories set out by the Council (market factors, cost factors, delivery factors) will each influence the economic viability of a proposal. Where the economic viability of a site is uncertain as a result of any one or more factors, then dependant upon suitability and availability, such sites should be viewed as coming forward in the medium to long-term.	
<b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b>	The availability and achievability test is considered to be a reasonable approach	The supporting comment is noted and welcomed.
<b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b>	<p>It is noted that a site may not be included in the 5 year supply if there is no intention to submit a planning application within 2 years.</p> <p>It is suggested that sites which are subject to local policy constraints should be included in the 5 year supply as the LDF might remove the conflicting policy / designation.</p>	<p>The figure is within 3 years not 2. The reasons for this are set out in the methodology framework. There needs to be a level of certainty about delivery for sites to included in the 5 year supply and this certainty is not there if a site is either subject to local environmental or policy designations which currently prevent development or if there is no prospect of a planning application being made for the next 3 years.</p> <p>The Council would also disagree that sites which are subject to policy constraints should be included in the 5 year supply as this would be interpreted as prejudging the outcome of the LDF. Given that SHLAA's and the 5 year supply should be updated annually then there is no need to include such sites in the 5 year supply until these issues are resolved.</p>
<b>Q 32. Should financial models such as residual valuation be used for some or all of the sites?</b>		
<b>Barton Wilmore</b>	Wainhomes considers that financial models should not be used for all sites because, they are too onerous.	The comments are noted.
<b>Q 33. What assumptions should be made with regard to lead times for sites which have gained planning permission?</b>		
<b>Barton Wilmore</b>	Wainhomes agrees with the Council's assumptions regarding lead times, but however, considers it appropriate that the methodology should state that the lead time should begin from when the section 106 is completed and signed.	The Council welcomes the support for its proposed approach and will seek the views of the SHLAA Working Group on lead times.
<b>Q 34. What assumptions should be made with regard to build rates?</b>		
<b>Barton Wilmore</b>	The HBF have confirmed in their representations to Stockton Council's SHLAA that the average completion rate for housing on a single site by a single builder ranges between 25 and 35 dwellings per annum. Where flats or apartments are involved the average completion rate ranges between 35 – 50. For larger site where two builders are involved, or where a builder operates the site as two sites (i.e. one producing houses, one producing flats) it is reasonable to double the output. The HBF also	The comments are noted and the information regarding the HBF's representations will be re-laid to the SHLAA Working Group for their consideration.

	advise that sites in the hands of an individual builder, even with a mix of houses and flats, very rarely exceed 50 dwellings per annum, and never get to 100. This advice should be taken into account when producing the SHLAA.	
<b>Q 35. What approach/action should the SHLAA Working Group take should it find that there are insufficient developable sites?</b>		
<b>Barton Wilmore</b>	Where the Working Group find that there are insufficient developable sites to fulfil the 5 year housing land supply, they should reconsider a Green Belt and greenfield land review as advised in Policy YH9 of the Yorkshire and Humber RSS	The question is referring not to the 5 year supply of deliverable sites but to the approach which should be taken if the total plan period quantum of developable sites is not available. The approach where there is not a 5 year supply of deliverable sites is set out in PPS3.
<b>Q 36. Is the sequential approach outlined in Table 12 appropriate?</b>		
<b>Barton Wilmore</b>	The sequential approach outlined in table 12 is not considered appropriate because it includes windfall sites, and PPS3 advises that windfall sites should not be included in the SHLAA unless there are genuine local circumstances. Please see response to question 40.	The Council disagrees with the comments. PPS 3 does allow for windfalls to be taken into account where there are genuine local circumstances to do so. Moreover windfalls are set out at stage 10 of the CLG best practice guidance after consideration of broad locations for development and the Council's sequential approach accords with this.
<b>Q 37. Should sites which have emerged during the course of the study be included in the SHLAA at Stage 8 or held back for the first annual SHLAA update?</b>		
<b>Barton Wilmore</b>	The SHLAA should remain flexible and in doing so should consider new circumstances, therefore taking into account any sites which have emerged during the course of the SHLAA.	The comments are noted.
<b>38. How should broad locations, if required, be identified?</b>		
<b>39. What criteria and method should be taken in calculating the capacity of broad locations?</b>		
<b>Barton Wilmore</b>	Wainhomes considers that these are matters which should be dealt with by the Core Strategy.	The comments are noted.
<b>Bradford Centre Regeneration</b>	The draft methodology proposes to begin by identifying the City Centre and Canal Road Corridor as broad locations for assessment. There is sufficient information, certainly in the city centre, to identify specific sites and BCR will work with the SHLAA Working Group at the appropriate time to assist in their identification.	The comments are noted and welcomed.
<b>Q 40. What approach should be taken to considering windfall within the SHLAA?</b>		
<b>Barton Wilmore</b>	PPS 3 advises that a windfall allowance can be taken into consideration where the Council can justify genuine local circumstances. Given the need for renaissance within the Bradford District we do not consider that the consideration of windfall	The need or otherwise to include a windfall allowance in the SHLAA should not be predetermined and should be addressed once the known supply of sites has been assessed.

	<p>sites can be justified.</p> <p>It may be relevant to consider windfall at stage 8 if the Council do not have a 5 year land supply, however we doubt that this will be a problem given the need for regeneration in the District.</p> <p>It is important to note that the Housing targets set by the RSS are minimum levels and there will be no harm should there be an overprovision of sites.</p>	<p>The Council considers that there could be considerable harm to sustainable development principles should a significant oversupply of land be identified in the LDF since this would most likely result in the unnecessary deletion of green belt and the bringing forward of greenfield land earlier than necessary.</p>
<p><b>Walker Morris on behalf of Mr &amp; Mrs Hopwood</b></p>	<p>The inclusion of windfall sites in the SHLAA is not encouraged as it leads to uncertainty in the housing projection figures. Whilst it is understood that the recent windfall completions that Bradford have experienced make up a large percentage of all housing development there is no evidence put forward to suggest that this pattern will continue. PPS3 outlines the circumstances in which windfalls should be included – ‘where LPA’s can provide robust evidence of genuine local circumstances that prevent specific sites being identified’. The Council have not put forward any evidence that would satisfy this criteria in PPS3.</p>	<p>The draft methodology does not propose the inclusion of windfalls in the land supply – it cannot in any case do so as the analysis of the nature and extent of the supply which is the core of the SHLAA has yet to be completed. However the CLG Practice Guidance for SHLAA does include at stage 10 the consideration of the contribution windfalls could make should the supply from identifiable sites be inadequate.</p>
<p><b>General Comments</b></p>		
<p><b>Bradford Centre Regeneration</b></p>	<p>BCR considers the methodology to be comprehensive and thorough</p>	<p>The comments are noted.</p>
<p><b>Natural England</b></p>	<p>Natural England welcomes the production of this Strategic Housing Land Availability Assessment (SHLAA) methodology.</p>	<p>The comment is noted and welcomed.</p>
<p><b>Sanderson Weatherall</b></p>	<p>The overall thrust of the document is supported.</p>	<p>The comment is welcomed.</p>
<p><b>Yorkshire Forward</b></p>	<p>We welcome the opportunity to participate in the development of local planning policy within the Yorkshire and Humber region as part of our role as a statutory consultee. However we have no comment to make on the SHLAA Methodology Consultation.</p>	<p>The comments are noted.</p>
<p><b>Burley Parish Council</b></p>	<p>The number of houses that it is anticipated will be required in 20 years time was based on recent general trends and already there has been significant changes in financial climate since the LDF consultation documents were published. The trends and numbers need to be kept under constant review. To be locked into a scheme of delivery that is not frequently reviewed and flexible would be nonsensical and commit us to development that might not be justified in the long term.</p>	<p>The comments are noted, however it is not the role of the SHLAA to assess or establish the requirement for housing over the LDF period – this is done via the production of the Regional Spatial Strategy and through the production of the Council’s Core Strategy. The SHLAA is merely assessing the potential housing land supply which could be used to meet the housing requirement. It will not itself commit any sites for development.</p>
<p><b>Burley Parish Council</b></p>	<p>Given the current build rate in Bradford in the last few buoyant years has been about 1500, it is quite a stretch to imagine how 2700 pa can be delivered.</p>	<p>The new house building targets are challenging. However it should be noted that the current levels of house building relate to both a plan and a land supply derived from the RUDP which was working to a figure of only 1390 per year not 2700. The SHLAA will provide a profile of the overall level of developable land in the district as a whole and within constituent parts of the district</p>

		and therefore inform the strategy within the new LDF for delivering 2700 houses per year up to 2026.
<b>Burley Parish Council</b>	One of the Parish Council's key concerns is regarding existing infrastructure in the Wharfe Valley. The Council should first establish where there is spare capacity in schools and transport. Wharfedale should not be considered a 'Transport Hub' – trains are full and roads gridlocked.	These comments are noted but refer to the Core Strategy process and are not directly relevant to the SHLAA. The comments will be passed to the Core Strategy team and considered as part of the work on the Preferred Options for that document .
<b>Burley Parish Council</b>	It is essential that Bradford works with neighbouring authorities to plan services such as education and take account of the impacts of the amount of building on the A65 in Leeds. The Parish Council would urge officers to consider the impact of expansion of any settlements along the Wharfe Valley will have on the whole area. The Wharfe Valley is operating at full capacity now and no more building should be considered for this area without first addressing the not insignificant infrastructure issues as outlined.	The comments are not directly relevant to the SHLAA or SHLAA methodology but relate to the LDF Core Strategy. The comments will therefore be passed to the Core Strategy Team and considered as part of ongoing work on the Preferred Options for that document.
<b>Burley Parish Council</b>	On deliverability the plan would have to identify priorities over the order in which the sites should be developed. This will ensure appropriate infrastructure is in place and sites are not cherry picked by developers.	These are essentially issues relating to the phasing of sites and the management of the housing land supply. These decisions will be taken within the LDF, more specifically the Core Strategy.
<b>Yorkshire and Humber Assembly</b>	No comments as are happy with the general approach.	The support for the methodology is noted.