

Representations to the
Bradford Core Strategy Publication Draft
(February 2014)

on behalf of

Barratt and David Wilson Homes,
Miller Homes, Redrow Homes,
Skipton Properties and Taylor Wimpey UK

JohnsonBrook
Planning & Development Consultants



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REPRESENTATIONS TO THE BRADFORD CORE STRATEGY PUBLICATION DRAFT (February 2014)

On behalf of Barratt and David Wilson Homes, Miller Homes, Redrow Homes, Skipton Properties and Taylor Wimpey UK

REPRESENTATIONS TO THE BRADFORD CORE STRATEGY PUBLICATION DRAFT (FEBRUARY 2014)

- 1.1 These representations have been prepared by Johnson Brook Planning and Development Ltd on behalf of the following clients:- Barratt and David Wilson Homes, Miller Homes, Redrow Homes, Skipton Properties and Taylor Wimpey UK.
- 1.2 The responses are presented in two parts:-
- 1.3 Part A: Policy Overview
 - o A response to the strategic policies and options for development and growth contained in the Publication Draft
 - o With regard to each of the strategic policies covered on behalf of our clients a commentary and conclusion on the soundness of the policy and its evidence base
 - o Where applicable proposed changes to policy content and evidence review in order to secure soundness.
- 1.4 Part B: Settlement specific commentary based on our knowledge and expertise relating to the District, its sub areas and settlements and on our assessment of area specific policies and development distribution and the associated evidence base, in particular the Growth Study produced on behalf of the Council by Broadway Malyan.

PART A: POLICY OVERVIEW

SECTION 2 BACKGROUND AND CONTEXT

- 2.1 The Local Enterprise Partnership working with the Leaders Board has produced the Leeds City Region (LCR) Local Enterprise Partnership Plan (April 2012). Subsequently Economic and Investment Plans have been produced. The Partnership Plan entitled " Realising the Potential " has a growth orientated approach. The Plan refers at page 6 to the future of the City Region's economy and to the growth trajectory produced by Experian which shows LCR growing at 2.2%/annum compared with the UK average of 2.3%. This suggests that the LCR GVA and productivity will continue to lag behind the UK average and that employment growth will be at a similar rate to the UK forecast growth rate at around an average of 0.5%/annum. " Such an outcome would see the gap between the LCR and the best performing parts of the UK continue to widen over the next 20 years." The target is to undertake interventions across LCR to improve the growth trajectory to an average of 0.6% annual growth and improved employment growth.
- 2.2 Bradford is identified as "a regional city " in the LCR plans and this is a continuation of the spatial policies contained in the Regional Spatial Strategy adopted in 2008 and now revoked. The growth aspirations for Bradford at this sub regional economic and spatial planning level are a very significant context which is not adequately reflected in the strategic policy content of the Publication Draft Core Strategy (PDCS). The LEP Strategic Economic Plan (Growth Plan for consultation – January 2014) indirectly supports the Council's jobs growth target. The whole approach contained in the latest LEP plan is to accelerate the rate of economic growth. One of the key challenges identified in this context is "building more homes for a growing population must be made a greater priority;" At paragraph 1.6 on page 8 emphasis is placed on the wider benefits to the UK economy as a whole which can be realised from a LCR that grows faster and realises its full potential. Strategic housing growth areas are identified on figure 1.6 of the LEP Investment Plan and these include the Canal Road Corridor in Bradford. Within the document the LEP identify the strong foundations of earlier work which has been going on since 2004 (paragraph 1.10). These foundations include the work which led to the adoption of the RSS in May 2008 and subsequent review work.

SECTION 3 SPATIAL VISION, PLAN OBJECTIVES AND CORE POLICIES

3.1 We support the vision for the Bradford District as stated in paragraph 3.3 and the strategic objectives listed in paragraph 3.15. These are strongly growth based in terms of both housing and employment provision. The final sentence of the stated vision refers to an economic transformation which is well aligned with the LEP Investment Plan and the growth policies at a national level contained in the NPPF and other documents. However a number of the Core Policies in this section of the publication draft CS (PDCS) either fail to match this appropriate vision or introduce policy content which will run counter to the achievement of the vision and the strategic objectives. There is also emphasis in the vision on growth in the Airedale and Wharfedale towns which is not supported in key policies on the quantum of housing and other development and infrastructure. Consequently certain of the policies or aspects of their content are unsound as they are not appropriately aligned with national policy, policy at the city region level, nor are they justified by the evidence base and they do not always constitute the most appropriate strategic approach.

POLICY P1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

3.2 We support this policy and its generally proactive approach which aligns with the approach towards supporting sustainable development in the NPPF.

STRATEGIC CORE POLICY 1 (SC1) OVERALL APPROACH AND KEY SPATIAL PRIORITIES

3.3 We support the transformational content of this policy and its alignment with the strategic objectives and national and city region policies. We support the content of policy SC1 B5 with regard to enhancing the roles of the principal towns of Ilkley, Keighley and Bingley and all of the local growth centres.

STRATEGIC CORE POLICY 2 (SC2) CLIMATE CHANGE AND RESOURCE USE.

3.4 We support the general content of policy SC2. It is important however in the context of the contents and aspirations of this policy to recognise that very often it is via development and investment associated with that development that adaptations to climate change can be assisted. For example the management and expansion of vulnerable habitat types can be achieved via a judicious balance of development and the associated transfer of open land within the control of developers from agricultural management regimes or underuse into well managed habitat. The benefits of this approach have not been adequately recognised in subsequent policies, in particular those which relate to the South Pennine Moors habitat and the attempts to limit the amount of residential development in Wharfedale and certain Airedale settlements.

3.5 The emphasis on focussing development and activity in the principal towns is not adequately supported in other policies particularly in relation to the town of Ilkley.

STRATEGIC CORE POLICY 3 (SC3) WORKING TOGETHER

3.6 Collaboration between the constituent councils of the LCR has improved considerably in recent months via the LEP and the Leaders Board and should further

improve as a result of the new combined West Yorkshire Authority which is to deal with strategic transport and economic development and is likely to have some form of strategic planning role. Again however some of the aspirational content of this policy is not supported by the actual content of subsequent CS policies. In particular achieving a balance between housing provision and job growth is not adequately supported by policies dealing with the housing requirement and supply. Achieving this highly desirable strategic balance is a key aspect of sustainable development planning and in order to fully support this more emphasis and provision for housing growth is essential.

STRATEGIC CORE POLICY 4 (SC4) HIERARCHY OF SETTLEMENTS

- 3.7 While we support the general tiers of the settlement hierarchy selected and the general thrust of concentrating development on the Regional City of Bradford (including Shipley) we conclude that some greater sophistication needs to be introduced into this policy and the related policies distributing housing growth throughout the District (i.e. the sub area policies and HO3). We conclude that the proportionate level of housing growth in Bradford (68%) needs to be slightly reduced to reflect a number of difficulties with deliverability and viability that will by degrees be resolved over time but will delay the achievement of housing completions in the first half of the plan period and is likely to result in some completions not being achieved within the plan period. When considered alongside our specific representations on the housing requirement this will not result in a reduction in the actual number of houses planned for the various sub area components of the Regional City.
- 3.8 We support the roles identified for the three Principal Towns stated at sub policies A and B. While we agree with the first sentence of sub policy C relating to the three Principal Towns we do not support the negative implications of the second sentence of C. The wording of this sentence should be altered to fully reflect the positive approach contained in sub policy 5 which is based on the creation and enhancement of green infrastructure and habitats. This is a very important pre-cursor to those policies which seek to limit growth, particularly in Ilkley.
- 3.9 We support the general identification of Thornton, Queensbury, Steeton with Eastburn and Silsden as Local Growth Centres. There is however limited evidence that it is the land supply constraints in the upper two tiers of the hierarchy which support the identification of these local growth centres. The ability to create future sustainable growth and their current scale are more significant factors for justifying this additional tier in the settlement hierarchy.
- 3.10 The wide array of local centre settlements includes considerable variety in terms of size, development potential, service provision, sustainable criteria etc. Some of these local centres have been growth villages in previous options (Menston and Burley-in-Wharfedale). Sub area location, market characteristics and the relative level of environmental constraints all create differences. While some variation in the new housing growth distribution has been introduced more variation and sophistication has merit where some increase in the level of development would bring benefits in terms of community development, green infrastructure, social (including affordable housing provision) and economic development (supporting job creation and rural diversification).

3.11 We support the written text content of paragraphs 3.68 to 3.70. This text strongly supports the growth potential of the three Principal Towns and our detailed work in the Bingley, Ilkley and Keighley areas over many years supports the implications of these aspirational statements that real growth can be achieved while maintaining and enhancing environmental qualities which retains their distinctiveness. As already stated pro-active approaches to growth and development in these towns can demonstrably support environmental improvements with good quality sustainable master planning as supported in the NPPF.

STRATEGIC CORE POLICY 5 (SC5) LOCATION OF DEVELOPMENT

3.12 This policy is in our submission unsound. Giving first priority to brownfield sites is not supported by the NPPF which uses the word "encourage" when referring to brownfield development. There is no basis in the NPPF for holding back greenfield sites on some assumed phased approach. This was the historic approach in PPG3, which was substantially modified in PPS3 via the introduction of a more market led approach. While local planning authorities are still encouraged to set local targets for brownfield supply and we do not disagree with the local targets being proposed by Bradford Council in the PDCS brownfield sites are not to be preferred on a phased policy basis over greenfield sites. Given the very high historic percentages of development on brownfield sites in Bradford from 2000 onwards and an array of issues associated with brownfield market delivery it will be difficult to achieve the brownfield targets in the early years of the plan period. We do not seek to reduce these local overall targets in any way insofar as they apply to the whole of the plan period nor do we wish to downgrade the significance of fully utilising brownfield sites wherever possible. However in order to maintain a deliverable five year land supply in Bradford a continuation of greenfield land release will be necessary year on year. Our extensive re-assessments of the deliverable five year land supply in Bradford, working with clients and other consultants demonstrates a continuing problem of achieving delivery over the last seven or eight years and even before this. The current supply remains at below 2.5 years.

3.13 Consequently this approach is also unsound when tested against the fully comprehensive evidence base including these recent five year land assessments. This type of phased priority approach has been a major contributor to the historic lack of a five year land supply in Bradford and the other districts of West Yorkshire. This has led to a series of appeals where in the great majority release has been supported on the basis of a poor level of deliverable supply.

3.14 The remaining second, third and fourth priorities are also lacking in justification and evidence based support. Not all greenfield opportunities are within the settlements as there remain some commitments in the form of greenfield allocations in the Replacement UDP which are yet to be implemented. It does not follow in sustainability terms that a greenfield opportunity within a settlement is more sustainable than a Green Belt release or an urban extension. Urban extensions of any scale, particularly those such as Holme Wood, which are in a weaker market area and require significant infrastructure investment require a much longer gestation period and their early release needs to be encouraged if they are to be fully realised within the plan period. Ranking urban extensions as a fourth priority has no evidential justification and NPPF supports the early consideration and allocation of such proposals.

- 3.15 With regard to the need for and the timing of any Green Belt releases the NPPF has a general presumption in the core planning principles set out at paragraph 17 that the Green Belt around our urban areas will be protected. The Green Belt policy content of the NPPF in paragraphs 79 and 83 is that their key characteristics are their permanence and openness and that once established they should only be altered in exceptional circumstances. This process is addressed through the development plan preparation and Bradford Council have concluded that a significant percentage of Green Belt land will need to be released within the plan period. Given the five year land supply problems and the national guidance requiring the identification of specific developable sites or broad locations for years 6 to 10 of the plan period and where possible years 11- 15 also (paragraph 47 NPPF) it is quite possible in the Bradford context that Green Belt land releases will be justified in the earlier parts of the plan period and in some cases in the first five years in order to achieve a five year supply of housing land where the site location and conditions are capable of delivering a sustainable development outcome.
- 3.16 By definition in the Bradford context larger urban extensions are likely to be in the Green Belt, with the exception of a very small number of remaining POL or reserve land sites. There is therefore no logic in affording such extensions a fourth priority.
- 3.17 The accessibility orientated approach contained in part B of this policy has no logical fit or justification in relation to the expressed part A priorities. While the criteria in part B with their accessibility orientated approach to site selection are supported they do not fit with this policy context nor are they the exclusive group of prime site selection criteria. In addition while the best use should be made of existing transport infrastructure and capacity the ability to make and fund future improvements is also a key consideration.
- 3.18 The whole of policy SC5 should be declared unsound and replaced by an appropriate/adapted site selection policy.

STRATEGIC CORE POLICY 6 (SC6) GREEN INFRASTRUCTURE

- 3.19 The policy content of SC6 and the explanatory text are fully supported and the District –wide opportunities for enhancing the amount, quality and connectivity of green infrastructure via development proposals are fully recognised. This approach will be realised via positive and proactive planning. It should however be recognised that the delivery of green infrastructure and other social, environmental and economic improvements via individual developments to realise their full sustainability potential needs comprehensive growth orientated planning.

STRATEGIC CORE POLICY 7 (SC7) GREEN BELT

- 3.20 In subsequent sections and policies on housing requirement and supply the need to identify Green Belt land releases accommodating some 11,000 dwellings is identified. This represents 26% of the residual housing requirement identified by the Council (see paragraphs 5.2.29 to 5.2.31 of the PDSC text). This is likely to be a minimum figure and is a broadly based estimate. When other development needs are taken into account including in particular the need for new employment sites the extent of Green Belt release required widens. The Council refer to a selective Green

Belt review as the way forward. A similar selective approach was proposed by Leeds City Council in their Core Strategy. Following the EIP the Inspector's recommended modifications included the deletion of the word "selective" and the City Council have accepted this. Given the tight definition of the Green Belt around all settlements in the Bradford hierarchy, the very wide extent of the Green Belt within the District, the need to review the differential contributions that tracts of Green Belt make to the five purposes of including land in the Green Belt and the lack of provision for a pool of reserve land for development beyond the plan period a more substantial review of Green Belt boundaries is necessary. The policy does not comply with the NPPF approach which seeks to identify sufficient land, including reserve land and to avoid a subsequent early review of the plan to make yet further changes to Green Belt boundaries. At paragraph 3.102 the Council state their intent to put off the major strategic review of boundaries. This is unsound as it is not supported by national policy, is not justified by the evidence of the land releases required for both allocations and reserve land with no provision having been made for the latter. We totally refute the argument that the contribution of windfall will allow the identified supply to last longer.

- 3.21 The extent of the Green Belt release required does amount to an extensive review which requires the examination of the relative merits of releases around all of the settlements in the identified hierarchy. This does not necessarily lead to a situation where a potential Green Belt release around the urban area of Bradford has to be compared with a release at Queensbury or around one of the local centres. However in considering Green Belt release around any settlement it is appropriate and logical to compare the broad relative merits and impacts of such a release with other potential releases around that settlement. A review methodology needs to be devised which maintains the position and relative importance of the settlements in the hierarchy. This full review will form a key part of the work in preparing the Sites and Policies DPD.
- 3.22 The policy as drafted makes no provision, in association with the suite of housing and employment policies, for the identification of a strategic supply of reserve land. National policy in the NPPF at paragraphs 84 and 85 states that when reviewing Green Belt boundaries local planning authorities should identify boundaries having regard to their intended permanence and they should be capable of enduring beyond the plan period and meeting "longer term development needs stretching well beyond the plan period. It is usually argued that in this context the established boundaries should identify at least five years supply of reserve land for housing and employment purposes. A supply of say two years does not equate to a time well beyond the plan period. On some occasions a 10 year reserve supply has been regarded as justifiable.
- 3.23 This policy and the explanatory text do not constitute a sound policy which should be carried forward. The policy as drafted fails all of the four tests of soundness in that it does not meet the objectively assessed housing needs, is not the most appropriate strategy when considered on the full evidence available, the plan would not be deliverable over the plan period as there would be no flexibility to bring reserve land forward and the policy does not accord with national policy.

STRATEGIC CORE POLICY (SC8) PROTECTING THE SOUTH PENNINE MOORS AND THEIR ZONE OF INFLUENCE.

3.24 We strongly object to the content of policy SC8. The policy as drafted is one which seeks to limit residential development in certain zones from the boundary of the South Pennine Moors SAC/SPA. Within zone A no net increase in development would be allowed. Within zone Bi there is a direct approach aimed at limiting the amount and extent of any development within the 400m to 2.5km zone where there would be an impact on the carrying capacity of identified bird populations and/or on sites that are used for foraging by these bird species or are important to the integrity of the designated site. This is stated to be a precautionary approach and it would apply to a very wide area of certain Wharfedale and Airedale settlements. In the widest zone, Bii, which extends from 2.5 km and up to 7kms from the SPA/SAC boundary there is an assumption, without justification, that there are still likely to be significant adverse effects resulting from development. These assumptions, should the policy be applied as written, would lead to a very significant limitation on the amount of development which can be accommodated in settlements located within areas of high housing need and demand. In fact it is clear from the written justification to this policy (paragraph 3.108) that the two Habitat Assessment reports for the Further Engagement Draft CS (2013) and the PDCS (2014) have been used as an 'advance mechanism' to assist in the justification for limiting development in Airedale and particularly in Wharfedale. We have carried out sufficient of our own assessment work and further work with our developer/landowner clients in Wharfedale, particularly in Ilkley where we have done a considerable amount of site assessment and development capacity work, to establish that substantial mitigation and habitat enhancement measures can be achieved in relation to potential allocation sites taken individually or collectively. The Council have used an avoidance of impacts approach as a first constraint sieve without allowing for mitigation and enhancement assessment at the same stage. A number of our clients have also employed an ecologist, Baker Consultants, to assess this approach and the findings of their assessment further undermines the acceptability and soundness of this policy approach.

3.25 The addition of a policy requirement suggesting an approach to defining a contributions mechanism where local populations increase is not justified by the available evidence and no clear policy content is included to provide clarity as to what is proposed and certainty as to how it is intended to apply this policy. If mitigation and enhancement can be provided the case for financial contributions may not exist.

3.26 In the conclusions of the Habitat Regulations Assessment (2014) produced as an updated evidence base for the PDCS at paragraph 8.2.1 the following statement is made:-

3.27 " Based on currently available evidence, it cannot be concluded with certainty that development proposed by the Core Strategy will not lead to adverse effects on the South Pennine Moors SAC and SPA via the following impact pathways:-

- Loss of supporting habitats
- Increased emissions to air from road traffic and
- Recreational impacts "

3.28 Paragraph 8.2.2 goes on to state that :- " the risk of adverse effects from a range of urban edge pressures is considered to be adequately mitigated by the plan's revised spatial strategy and policy SC8 in particular." This is an attempt to justify a particular policy approach to limit development prior to the gathering of the full required evidence base which needs to include information on the scope for mitigation and enhancement at a local level, the potential to change agricultural management regimes to improve habitats and the improvement of the Council's own countryside management and recreation regimes on the designated moorland areas. We disagree with the further conclusion in paragraph 8.3.1 that the approach taken by the Council and their consultants, Urban Edge, in drafting the PDCS "establishes a reasonable and pragmatic strategic approach to reducing the risk of adverse effects (including by re-distributing development and providing for alternative recreational sites) and mitigating residual impacts (through access and habitat management) to demonstrate that adverse effects are capable of being avoided and/or mitigated." Reference is made to preparing a further iteration of the Appropriate Assessment to update the assessment in relation to the CS Submission Draft. If this is the case then the development industry and the general public must be given a further opportunity to comment on any revisions to the evidence base and policy adaptations which may result.

3.29 We are able to provide the Council with more detailed evidence prior to the finalisation of the Submission Draft CS which demonstrates how new residential and other development can be accommodated while at the same time providing a high level of mitigation and enhancement via new green infrastructure and habitat proposals. As the Council have taken a settlement hierarchy approach to the distribution of the housing requirement it is appropriate to provide this more detailed evidence during the preparation of the Submission Draft CS to establish the development capacities and environmental improvements which can be achieved in concert.

3.30 As currently drafted we conclude that policy SC8 is unsound. National policy under the heading plan-making at paragraph 165 requires local planning authorities to base their policies and plans on up to date information including an assessment of existing and potential components of ecological networks. The policy at paragraph 167 continues by stating that environmental assessments should be started early in the plan making process and that key stakeholders should be consulted in identifying the issues that an assessment is to cover. The Habitat Regulations Appropriate Assessment was not introduced until the most recent stages of the preparation of the Core Strategy and the development industry, as a key stakeholder were not consulted on the scoping of this assessment. The proposed policy and its zonal criteria do not form a clear full criteria based policy against which proposals for development can be assessed. The policy is negative and precautionary and lacks the balance of positive criteria. The Council have not set out in sufficient strategic detail how they intend to plan positively for " the creation, protection, enhancement and management of networks of biodiversity and green infrastructure:" (paragraphs 113 and 114 of the NPPF). A much clearer, more specific and better balanced set of policy criteria are required in a totally revised policy SC8 which will enable a fair assessment of development proposals to proceed in a balanced way. At various points in the explanatory text the Council appear to implicitly accept the considerable shortcomings of this policy approach, as drafted, by suggesting that further work and assessment is necessary. The final explanatory paragraph of this section of the

PDSCS (3.122) suggests that a long term mitigation strategy can be produced to ensure that planned growth can be accommodated. There is a belated acknowledgement of the need to work with a range of interested parties to produce this. This mitigation strategy should be part of the evidence base for the CS. This policy is therefore unsound as it does not meet national policy; is not the most appropriate strategy and is not justified by the evidence base used by the council to date.

STRATEGIC CORE POLICY (SC 9) MAKING GREAT PLACES

3.31 We support the content of this policy and the concentration of development on the City of Bradford and the three principal towns of Ilkley, Keighley and Bingley as well as the creation of sustainable rural communities. Our location and site specific assessments lead us to the conclusion that the levels of growth we are promoting can be accommodated in a way which results in high quality places and attractive and sustainable settlements.

SECTION 4 SUB AREA POLICIES

THE CITY OF BRADFORD SUB AREA POLICY BD1

CITY CENTRE AND SHIPLEY- CANAL ROAD CORRIDOR

4.1 While we generally support the proposed level of residential development in the City Centre and in the Shipley- Canal Road Corridor and the regenerative effects that these proposals will realise they are strongly reliant on the provision of the necessary transport, other physical and social infrastructure. We have expressed our concerns in an earlier part of this statement with regard to the viability and deliverability of these proposals during the earlier part of the plan period. The provision of the required infrastructure will improve this position but the likely long lead times for some of the transport provision, in particular the Canal Road corridor improvements and the Shipley Eastern Relief Road could significantly delay development. The Infrastructure Plan identifies a major current funding gap on both essential and desirable transport infrastructure. New dwellings on City Centre sites will require the supporting provision of social and environmental infrastructure improvements.

4.2 The Canal Road Corridor development is recognised in the LEP Investment Plan as a development of City Region importance. In order to assist delivery a much extended and clearer strategic framework is required in the Core Strategy.

SOUTH EAST BRADFORD AND HOLME WOOD URBAN EXTENSION PROPOSAL

4.3 The generality of the proposals for an urban extension in south east Bradford at Holme Wood are supported. The Neighbourhood Plan produced has a very strong social and economic evidence base content on the existing Holme Wood community but this Plan, which is not a statutory neighbourhood plan produced under the Localism Act procedures, lacks an analytical planning and development section which assesses in depth the extent of the urban extension proposals, the level and cost of supporting infrastructure necessary and the delivery mechanisms which will achieve a particular level of development and some regeneration benefits for the existing communities. As with the major Canal Road project further strategic framework guidance should be added to the Submission Draft of the CS to more clearly explain the feasibility and deliverability of this proposal and to test that the indicative dwelling numbers can be strategically achieved. The provision of a new relief road linking the A650 and the M62/M621 motorways to the south and south east with Tyersal and Thombury to the north needs further strategic evaluation. The current proposals indicate a road connecting into and terminating at Holme Wood which is considered to be a strategically regressive move contrary to best transport planning and the future regeneration of the Holme Wood community. A link from a relief road into Holme Wood should be planned which reduces the potential penetration of through traffic. This proposal is of strategic importance to south east Bradford but it is essential that the level of development proposed and its delivery are demonstrated as strategically feasible at this point. As this development will take place in an area where current house prices are not well above the sub area average the extent to which realistic development cross-funding by section 106 or CIL can be achieved needs strategic consideration. Further work and evidenced based assessment is required to support the soundness of the strategic Holme Wood urban extension proposal.

NORTH EAST BRADFORD

4.4 We support the proposals for around an additional 4,700 dwellings in this sub area of the Regional City. This will include the need for some local Green Belt boundary amendments. We support the proposed technology park and commercial enterprise at Apperley Bridge which in combination with the new railway station, to be delivered in 2014/15 will enhance the sustainability of development in this sub area.

NORTH WEST AND SOUTH WEST BRADFORD

4.5 The general proposals for these two sub areas are supported.

LEEDS- BRADFORD CORRIDOR

4.6 This is recognised as a major regeneration corridor and further strategic framework clarification is required with regard to key proposals at the Bradford end of the corridor as well as any linking cross boundary proposals. One cross boundary proposal is referred to at E 1 on page 61 of the PDSC and this is a strategically placed country park. While this is indicated on the sub area Spatial Vision Diagram its general extent should be clearly described.

SECTION F TRANSPORT

4.7 The transport schemes listed are more in the form of an aspirational list rather than a programmed and deliverable set of strategic projects. While we recognise that much time and effort will be required to bridge the funding gap greater clarity and feasibility of delivery well within the plan period is required for many of these key infrastructure schemes. A stronger justifying linkage is required with more text being incorporated from the Infrastructure Plan into the Submission Draft CS itself. This will strengthen the bidding process for public funding contributions and help to clarify where, when and at what level private sector contributions may be required. Without this greater clarity the level of transformation and change envisaged will not be achieved within the Plan Period and Sub Area policies BD1 and BD 2 will not be wholly realised.

AIREDALE SUB AREA POLICY 1 (AD 1)

4.8 The broad level of housing distribution proposed for Airedale and its constituent settlements is supported with the qualification that amended higher figures will result from our re-distribution of the enhanced requirement figure for the District as a whole.

4.9 The continuation of comprehensive regeneration in central Keighley is supported and we consider that these aspirations are achievable with a combination of residential, retail and employment development in well planned and designed formats. The need for sustainable urban extensions into the Green Belt around Keighley will be necessary to meet the housing requirement in the plan period and the initial years beyond 2030.

4.10 The proposed level of development in the new Principal Town of Bingley is supported. The capacity for development on identified urban brownfield sites in the up to date SHLAA is limited and the earliest possible realisation of the committed

urban extension at Micklethwaite (a site which has been allocated since the 1960 Development Plan) is essential to delivery in the early part of the plan period.

- 4.11 Steeton with Eastburn is supported as a local growth centre based on its excellent public transport and road connections, the extent of existing employment offered and the potential for growth. The need for some Green Belt land release is supported.
- 4.12 The level of development proposed for Baildon is generally supported with the qualification that this will be slightly higher based on our overall housing requirement assessment. There are few sites available within the urban area and some localised Green Belt land release will be necessary.
- 4.13 Growth at Silsden is supported together with local infrastructure to enhance sustainable transport connectivity.
- 4.14 The potential for further economic development in Airedale is considerable given the level of transformation already achieved by the Airedale Master Plan proposals (end date of this plan is 2015). New housing constitutes essential infrastructure to support this economic growth potential.

WHARFEDALE SUB AREA POLICY 1 (WD1)

- 4.15 The proposed figure of 1,600 dwellings for Wharfedale within the plan period to 2030 comprises a substantial and unjustified reduction on the figure of 3,100 contained in the Further Engagement Draft CS. As stated in our response in relation to other Strategic Core policies and housing policies our assessment of housing need and demand in Wharfedale is significantly different to that now produced by the Council in their current evidence base and in the PDCS policies as drafted. Our detailed response on policies HO1, the housing requirement, HO2 Housing Supply and HO3 Housing Distribution provide a large part of the justification for a higher level of housing provision in Wharfedale. In addition our analysis of policy SC8 together with that of Baker Consultants (the ecologists acting on behalf of a number of clients) and its constraining approach to housing supply and delivery forms part of our Wharfedale sub area case. We have also worked together with Nathaniel Litchfield and Partners on a sub market housing assessment of Wharfedale on behalf of mutual clients. This sub market assessment of market indicators in Wharfedale and the need to make adjustments to the basic outcomes of the household projections for this area have been informed by the NPPF housing growth policy content and the National Planning Practice Guidance on market signals and how they need to be taken into account. The lead author of these submissions has 30 years experience of living and working in the Wharfedale area and has been able to observe the general trends and changes in market indicators over a long period.
- 4.16 Our conclusions are that the sub area policy and the housing distribution figures in Wharfedale settlements need adjustments as shown in our revised table for policy HO3. Higher housing provision figures are justified particularly in Ilkley which, as the Principal Town in Wharfedale is in most other parts of the CS emphasised as a key location for growth and the provision/enhancement of supporting infrastructure. In order to make the Wharfedale market more affordable (in the widest sense of affordability including social affordable provision and first level entry market affordable dwellings) it is essential to enhance supply as the main driver of

reductions in high house purchase and rental prices and high land purchase prices. Actual supply has been historically constrained in this sub area. There is general acceptance in the sub area policy that significant Green Belt releases will be necessary. Our recent assessment work in Wharfedale generally and in Ilkley and Addingham specifically indicates those locations where Green Belt release can be sustainably achieved and Green Belt boundaries can be adjusted to long term positions which will allow for development required in the plan period to 2030 and for at least five years beyond this in the form of reserve land designations. This form of development can be sustainably achieved and via careful area and site master planning will realise new and enhanced green infrastructure and habitat. We have already carried out sufficient assessment work to be able to demonstrate to the Council and the Parish Council, who are progressing a neighbourhood plan for Ilkley, in the short term how an enhanced level of development can be accommodated while minimising environmental impacts and enhancing environmental, physical and social infrastructure.

- 4.17 We support the provision of a new high quality business park in Ilkley, positioned to the east of the town as a sustainable urban extension also incorporating a new secondary school. These comprehensive proposals have already been discussed with the Council.
- 4.18 Appendix 1 to these submissions contains the sub market housing assessment produced by Nathaniel Litchfield and Partners as the lead consultants. Appendix 2 is an ecological assessment produced by Baker Consultants.

SUB AREA POLICY 2 (WD2) INVESTMENT PRIORITIES FOR THE WHARFEDALE SUB AREA

- 4.19 We support this transformation and change policy and the need to target public and private sector investment to achieve the headline requirements of economic development, housing growth, green infrastructure, community facilities and enhanced accessibility. We support Green Belt releases at Ilkley and at Addingham. The latter is supported by the need for local housing, the wider need to enhance provision in Wharfedale alongside greater affordability, the ability to provide green infrastructure and new habitat via land release and the economic boost which would be provided for local services and public transport.
- 4.20 Further clarification is required in the policy content on how, when and where infrastructure improvements will be delivered.

SOUTH PENNINE TOWNS AND VILLAGES SUB AREA POLICY 1 (PN1)

- 4.21 We support the proposals for housing growth at Queensbury and Thornton as Local Growth Centres. Green Belt releases in these areas will also have to take account of reserve land requirements to provide further certainty of overall supply and flexibility in delivery.

SECTION 5 THEMATIC POLICIES

ECONOMY AND JOBS

POLICY EC1- CREATING A SUCCESSFUL AND COMPETITIVE BRADFORD DISTRICT ECONOMY WITHIN THE LEEDS CITY REGION.

5.1 We support the general content of this policy and the Council's drive to create a more successful and competitive District economy. We support the key locations for economic development identified in sub policy EC1B.

POLICY EC2- SUPPORTING BUSINESS AND JOB CREATION

5.2 We support the level of job growth identified in this policy at 2,897 jobs per annum and conclude that this aligns with the national policy drive for growth and that contained in the LEP City Region plans. We also support the quantum of new employment land to be provided at 135 hectares with the addition of a reserve of future land equating to at least five years provision beyond the close of the current plan period. We also support the need to achieve a high level of containment of new jobs and housing growth within the District boundaries in order to achieve a sustainable approach and avoid longer distance car commuting. The co-location of homes and jobs should be considered wherever possible and particularly in the larger urban extension projects in the City and the Principal Towns.

5.3 The need for the relatively high level of job growth is well founded given the growth in the District's population and the younger economically active age groupings and the need to move well away from current and potential unemployment rates. The Council recognise that the achievement of full employment while aspirationally desirable is not actually achievable within the plan period.

5.4 The work undertaken by Nathaniel Litchfield and Partners and submitted on behalf of clients as an objection to the policy HO1 housing requirement assessment is based on a re-modelling approach examining various scenarios and then supporting the job growth scenario adopted by the Council in policy EC2. We support the Lichfield assessment on behalf of our clients.

POLICY EC3 EMPLOYMENT LAND REQUIREMENT

5.5 While we support the generality of the overall employment land requirement on a District -wide basis plus an allowance for reserve land we object to the reduced provision for Wharfedale at 5 hectares. The Habitats Regulations Assessment does not, for the reasons already stated in relation to residential development, justify such a pro-rata reduction in provision in this sub area. We are aware that there are a number of Ilkley based entrepreneurs already in business elsewhere, or wishing to set up in business who wish to locate in new premises in the town. This would contribute significantly to the transforming economic development required in Wharfedale and the wider District. A policy addition should be made to EC3 C to provide for at least 7 hectares of employment land via a single development as part of a master planned Green Belt land release to the east of Ilkley in association with a new secondary school and other supporting development.

POLICY EC5 – CITY , TOWN, DISTRICT AND LOCAL CENTRES

5.6 The policy of enhancing the role and function of all the identified centres is supported.

TRANSPORTATION AND MOVEMENT

POLICY TR1 – TRAVEL REDUCTION AND MODAL SHIFT

5.7 The overall aims and content of this policy are supported along with the use of accessibility modelling and mapping techniques to plan sustainably for larger scale developments.

POLICY TR2 –PARKING POLICY

5.8 We object to the wording of sub policy D regarding the provision of additional bus and rail park and ride facilities insofar as this seeks to limit park and ride provision where there may be an existing capacity problem on the rail network. This policy is currently unjustified by evidence and should be positively reviewed in a context of seeking to improve the performance of the rail network in terms of quality and carrying capacity (see also policy TR3 D).

POLICY TR7 – TRANSPORT INVESTMENT AND MANAGEMENT PRIORITIES

5.9 At the introduction to this policy a proposed prioritisation of schemes is identified. With the exception of priority D we would suggest that the differentiation between categories A, B and C may not be justified in many cases whereas a cost benefit and return on capital invested approach would be more appropriate.

5.10 Given the central significance of transport infrastructure to the delivery of all the CS key spatial and growth policies (including the sub area policies) it is essential that a full set of transport projects and priorities are added to policy TR7 before it is finalised. These should be clearly established in this policy and at the heart of the CS and not left solely to a listing in the Infrastructure plan. This policy needs to be strong, clear and fully comprehensive in order to form a sound basis for funding bids and private sector contributions where appropriate.

5.11 The Local Infrastructure Plan at 6.2 states that " it is imperative that greater alignment is reached between the delivery and funding of transport infrastructure and strategies for growth and regeneration. As many of the transport infrastructure investment proposals are dependent on sources of funding which are external to the Council this approach is particularly important in the light of the scale of the funding gaps identified on essential and desirable schemes.

PLANNING FOR PEOPLE – HOUSING

POLICY HO1 THE DISTRICT'S HOUSING REQUIREMENT

5.12 We have carefully reviewed the content of this policy and the conclusions on the level of the District's Housing Requirement together with the evidence base used by the Council, which is primarily contained within the two reports commissioned from GVA/Edge Analytics in February 2013 and August 2013. Based on our experience of

Bradford and the extent of its housing needs, other evidence based documents used by the Council (e.g Homes and Homelessness Strategy), other evidence documents not considered by the Council, an assessment of the 2011 Interim Household Projections and consideration of the alternative demographic/economic modelling produced by Nathaniel Litchfield and Partners we conclude that the requirement as currently identified in policy HO1 does not constitute a comprehensive and objective assessment of the housing need in the District. On this basis the policy is unsound as it is based on a restricted and misleading and not a proportionate evidence base.

5.13 One of the "Core Planning Principles" of the NPPF is to proactively drive and support sustainable economic development to deliver the homes the country needs and every effort should be made to objectively identify and meet that housing need. Local Plans are to set out a clear strategy for allocating sufficient land which is suitable for housing development (NPPF paragraph 17). Under the sub heading " Delivering a wide choice of high quality homes", paragraph 47 of the NPPF sends out a very clear message that the Government's main aim is to "significantly boost" housing supply and in driving forward this aim LPA's are required to use an appropriately derived evidence base to ensure that their local plan meets the full objectively assessed needs for market and affordable housing.

5.14 In preparing their assessment Bradford Council have selected an appropriate end date for the plan period of 2030 though they have not provided for any flexibility of supply around the years which fall towards the end of the plan period and the five years or so beyond the plan period. We have already identified the need for a reserve land supply for housing as a consequence of the Green Belt review which is an urgent short term requirement. When identifying the housing requirement of 42,100 in the PDCS the Council do state this should be treated as a minimum figure but they do not go on to provide for a range or a flexibility mechanism. In these circumstances and on the basis of all the evidence we have assessed we conclude that the requirement figure should be 47,000. We agree with the Council's provision for past under supply of 7,687 dwellings.

5.15 The work carried out by GVA/Edge Analytics in their two reports in many respects parallels that undertaken for the Leeds CS and which was considered at the Leeds EIP in October. The full report of the Leeds Inspector has yet to be produced but it is significant that the Edge Analytics witness, Dr Peter Bowden, at the Leeds EIP agreed that modifications to the findings in their Leeds reports were necessary to achieve a better alignment between homes and jobs leading to an agreement of a higher annual housing requirement figure. GVA's first and main report for Bradford is based on the 2008 household projections which are widely regarded as a relatively optimistic economic outlook in terms of household formation rates. The addendum report was produced at the Council's request as a result of the more restrictive predictions on household formation contained in the Interim Household Projections for 2011 produced in 2013. It is widely agreed by demographers and planning consultants involved in this type of assessment that the rushed and interim nature of these projections considerably reduces their reliability. The fact that they only look ahead to 2021 is a further acknowledged drawback. Indeed GVA/Edge in their addendum report themselves acknowledge some of these shortcomings. At paragraph 2.3 of the addendum report the following statement is made:- " For this reason the 2011 based population projections provide a less reliable 'trend ' projection of population growth than would otherwise be the case." These interim

projections are to be superseded by the new official projections later this year. In summary the 2008 household projections were more optimistic in terms of rates of new household formation based on the trends experienced during a period of growth from 2000 to 2007/8. The 2011 projections take account of a period of prolonged recession and are generally pessimistic.

5.16 In a paper produced for the Town and Country Planning Association (" Town and Country Planning Tomorrow Series – Paper 16- New Estimates of Housing Demand and Need in England 2011 to 2031 ") by Alan Holmans of the Cambridge Centre for Housing and Planning Research a different approach is advocated for plan making purposes. I provide at Appendix 3 to this submission the key headlines and executive summary of this important paper which was referenced in a speech by the planning minister, Nick Boles MP to the Policy Exchange in January 2013. Essentially Holmans puts forward a logical argument for deriving longer term trend base assessments for planning and therefore utilises the 20 year period. It is a highly relevant approach in the Bradford context given the plan end date of 2030. A central assumption in the Holman paper is that the economic impacts of the financial crisis and the recession and a depressed housing market had a regressive impact on household formation rates and that of the 375,000 household shortfall relative to trend, around 175,000 of that shortfall will be replaced across the remainder of the period. The key headline projections and conclusions still demonstrate an enhanced annual housing requirement for England even when the considerably lower rates of household formation are used.

5.17 Detailed short term evidence provided by first time buyer data provide evidence of higher rates of household formation and a return to the levels of household formation experienced at the end of the relative boom years in 2007. This trend established in August 2013 (First Time Buyer Monitor – produced by LSL Property Services plc) has continued into the early part of this year. The February 2014 First Time Buyer Tracker also produced by LSL Property Services demonstrates that the housing market remains accessible to first time buyers due to an increase in high loan to value lending off-setting the rise in the purchase price of dwellings for first time buyers. (See these LSL documents at Appendix 4 to this statement). David Newnes, Director of Your Move and Reeds Rains Estate Agents (part of LSL Property Services) presenting the February 2014 Tracker continued to emphasise the need for "far more house building" as part of a sustainable economic recovery. This message is one which has been reiterated by a number of leading commentators and the argument for enhancing housing supply was the strongest message in the Barker Report (2003) and in subsequent reports and Government policy statements including " Laying the Foundations " the Government's Housing Strategy produced in 2011.

5.18 The impact of the 'Help to Buy' scheme has been experienced in this recent trend and the Chancellor's decision in his March budget to extend this scheme for a further four years is likely to have a continuing effect. During this same short period 2012-2014 the UK economy has emerged from recession into a period of initial slight growth with future growth projected for 2014 and 2015 rising. These short term economic and market stimulus effects are increasing confidence and job creation. While real incomes are not necessarily rising these other impacts are enhancing housing take up at the first time buyer level with average first time buyer deposits

also increasing. The willingness to lend and mortgage availability have also improved in the short term.

5.19 Consideration of these short and long term trends in combination present a different picture to that arising from the GVA/Edge analysis and assessment of the housing requirement in Bradford District. Other local factors include the differences in the demographic make-up of Bradford's population and the considerable increase in the number of young people compared with the national average and in particular the increase in the population of working age which will occur across the plan period. While Bradford household and individual incomes are below national averages so are house prices in the majority of the District. The pent up propensity for households to form is particularly evident in Bradford amongst young people of working age and in Asian and other ethnic groupings which make up the majority of households in the main urban area. The average household size is large at 2.6 persons. Improving economic conditions and job prospects are likely to lead to an acceleration of household formation in these groupings.

5.20 The problems of homelessness, affordability and suppressed demand are a very significant problem in Bradford District. The regional director of the National Housing Federation (representing housing associations) in a recent article in the Bradford Telegraph and Argus referred to an affordable housing crisis in the District. While Bradford is rated as one of the most affordable districts in the country with a current average house price of £142,000 average earnings are well below the national average at £18,500. In the NHF assessment, based on research and interrogation of the Council's Housing Division records an estimated 20,000 people were on the waiting list for social housing with total supply and affordable supply delivery over recent years falling well below targets leading to a widening gap between need/demand and supply.

5.21 The Council's Housing and Homelessness Strategy is part of the evidence base for the PDCS. This document, which looks forward over five years, also identifies a widening gap between supply and need. The Strategy document states on page 6 that housing completions have fallen well below the rate of new household formation. Overcrowding has increased to nearly 10% of households (page 8). The SHMA estimates that up to 25% of all new homes need to be affordable in order to meet both the current backlog and projected population growth. Homelessness prevention caseloads have risen from 2,000/year to 6,000/year since 2008 (page 16) and there is also a known problem of hidden homelessness. In a response to a Freedom of Information request on the 10th February this year with regard to the extent of the Council's waiting list and related questions the Council state that they do not currently produce a waiting list and operate a choice based lettings system called "open-moves" run by In Communities, the largest social housing provider in the District. There are 10,000 householders registered on this database as 'active' bidders meaning that they have registered and made a bid but have not been housed through the CBL process.

5.22 A major factor in dealing with the problems of homelessness, affordability and overcrowding in the District is the enhancement of supply. Enhanced open market supply will add to the numbers of affordable units particularly as economic conditions improve but other sources of supply via the Council and housing associations are also important.

5.23 Government policy in the NPPF is to boost significantly the supply of housing and to meet the full objectively assessed needs (paragraph 47). At paragraph 158 of the NPPF under the heading plan-making the policy states that strategies for housing should take " full account of relevant market and economic signals." It is not therefore a matter of relying simply on demographic assessment it is a blend of demography, up to date economic and market trends at national and local level and planning policy approaches attuned to local requirements. We have carefully considered the approach taken and the conclusions arrived at in the NLP representations on policy HO1 based on our own assessment of up to date national and local market, economic and policy drivers. We agree with and support the following conclusions in the NLP assessment:-

- The projections derived from the GVA/Edge reports and used by the Council in arriving at their requirement figure are trend based and do not allow for policy and other changes at the national or local level.
- There is a clear disconnect between the job target selected in the PDCS and the job target used by GVA/Edge in their addendum report to derive the selected housing requirement figure. Bradford's role as a regional city (a policy based role), its key future contribution to the LCR growth targets together with the significant growth in the level of young economically active people beyond national and regional averages are amongst the key arguments supporting the use of the higher job growth figure. The NPPF states at paragraph 154 that Local Plans should be aspirational but realistic.
- That the assumptions used by GVA/Edge for household formation post 2021 are flawed. This is supported by Holman's work as well as the NLP modelling approach.
- The creation of an arbitrary mid- point scenario has no policy or other justification
- The need to meet the full objectively assessed affordable need in Bradford , identified in the SHMA as 769 dwellings would not be met by a 2,200 annual dwelling requirement figure.

5.24 Based on all of the above factors we conclude that the selected requirement figure in the PDCS does not meet the full objectively assessed needs and that when housing and employment policy is fully aligned within a revised Core Strategy, on a full and up to date evidence base and compliance with national growth policy a higher housing requirement is justified. We conclude that the residual requirement over the remainder of the plan period should be at least 47,000 dwellings. Policy HO1 as drafted is unsound in that it does not adequately comply with the national planning policy content referred to above; the approach is not justified and is not the most appropriate alternative to select when a wider and more considered evidence base is used; finally the plan as it stands is not positively prepared as it does not meet the full objectively assessed housing needs.

POLICY HO2- STRATEGIC SOURCES OF HOUSING SUPPLY

5.25 The Directors of Johnson Brook Planning have had a lead role in two five year housing land supply assessments in recent years and in two planning appeals where

the five year supply and the SHLAA supply over a longer period were assessed and presented as evidence. The actual evidence on supply is that there is a delivery gap and that the SHLAA sites have not been sufficiently tested to a point where it can be concluded that all sites are available, suitable and deliverable. Sample sub area assessments of SHLAA sites demonstrate that some smaller urban sites are unlikely to be deliverable due to a mix of constraints that will be extremely difficult to resolve. This problem is to some extent identified in paragraph 5.2.29 of the PDCS. We also agree with the assessment at paragraph 5.2.30 that some SHLAA sites are likely to remain undeveloped due to environmental and amenity considerations. Work on applications in the Bradford District has demonstrated that access, topographical and other constraints also limits site net dwelling yields, often leading to a net density below the assumed 30/hectare.

5.26 The assumed levels of supply for certain of the major area based growth initiatives will be subject to further testing as the action area plans and master plans are developed. Evidence from other local plan core strategies which include large area based growth initiatives suggest that there is a need to provide a clear and expanded strategic framework policy statement with supporting evidence in order to demonstrate the delivery potential, infrastructure and other requirements which will lead to a high degree of certainty on the housing capacity which is achievable. We are aware of the on-going work on the City Centre and Canal Road Area Action Plans and the Holme Wood informal Neighbourhood Plan. The strategic frameworks for these plans should be incorporated in summary form in the submission draft CS with schedules of infrastructure requirements and delivery programmes. Without this clarity there is some doubt on the delivery capacity intended for these areas and their major contribution to the overall requirement total. The extent of, and the delivery programme for the Holme Wood urban extension needs further testing in the period prior to finalising the submission draft CS. The extent of the highways and transport infrastructure required needs much clearer definition at this strategic stage alongside a housing delivery programme. There is a general assumption in the PDCS that significant funding will be created for the improvement of the existing urban area via the new development. This lacks any clarity or certainty and needs further discussion and testing of feasibility.

5.27 The conclusion from this broad analysis of supply is that the supply gap may be larger than currently anticipated. While we do not challenge the overall soundness of this policy we do conclude that more work is necessary to justify the level of supply achievable from some of the component sources.

POLICY HO3 – DISTRIBUTION OF HOUSING DEVELOPMENT

5.28 We conclude that the policy HO3 distribution of the housing requirement is not currently sound. Our initial reason is that this does not meet the revised global requirement which we, NLP and others are advocating in our submissions based on an evidence base which has stronger justification than that utilised by the Council.

5.29 We do not agree with the conclusion that transport should not be a main factor used to determine the distribution of housing growth. We would argue that transport is a main factor to be taken into account especially where existing and planned transport infrastructure provides a travel option which is already demonstrably successful such as the Airedale and Wharfedale electrified rail services connecting local communities

and local communities with the core city centres of Bradford and Leeds. The electrification of these lines and the subsequent provision of new rolling stock has led to year on year passenger growth. Recent capacity enhancements have been achieved by adding additional services during the peak commuting hours. While the travelling public have at times complained of congestion on these services the numbers surveyed have generally been below the national congestion standard in the peak hours (i.e 135% of seating capacity).

5.30 The Local Infrastructure Plan identifies large funding gaps for essential and desirable transport projects. The PDCS justification at paragraphs 5.2.46 and 5.2.47 defers strategic decisions on transport projects and states that further work is required. Strategic spatial planning and distribution of housing and employment growth must go hand in hand with the identification of priority transport projects and the realistic means for securing the delivery of this essential infrastructure. It is clear that further work is required to arrive at a more balanced, informed and justified approach to housing distribution and its key relationship with transport infrastructure both existing and planned. Section 4 of the NPPF at paragraphs 30, 31, 32, 34, 35 and 37 sets a clear policy framework for a linked approach to land use and transportation planning.

5.31 We disagree with the conclusion at paragraph 5.2.50 that the current SHLAA provides the most critical element of the reality checking process for the re-distribution of the requirement figure. We agree that the Growth Study provides a strategic level assessment which is very helpful evidence for the formulation of CS distribution policies. We have reviewed the approach taken in the Growth Study and consider that Green Belt, which is a policy constraint, has been 'mixed in' with environmental constraints. It is certainly the case that more weight should be applied to primary environmental constraints in a first strategic sieve of location and site opportunities than Green Belt designation, which tends to constitute a very tight boundary around the existing urban areas.

5.32 As already stated in relation to policy SC8 and the sub area policies we have carefully reviewed the Habitats Assessment and we have criticised the way in which this has been used as a primary evidence base for reducing the amount of housing particularly in the Wharfedale settlements. Our general planning knowledge and evidence combined with specific site and location assessments together with the specialist ecological critique provided on behalf of some our clients by Baker Consultants clearly demonstrates that the Habitats Assessment 2014 does not constitute a reliable and justified evidence source for use in reducing contributions from certain settlements in the hierarchy and re-distributing this to other sub areas in some cases distant from where that proportion of need arises. This part of the evidence base does not constitute a justified or sound evidence base for reducing housing requirement shares in some settlements and re-distributing the difference to increase provision in other sub areas.

5.33 We disagree with the conclusions in paragraph 5.2.58 with regard to the argument that supply could be increased in Wharfedale to achieve more affordable housing but such an approach is not justified because of the weighting of the quantum of affordable need towards the main urban area of Bradford. Increasing the supply in Wharfedale would bring these benefits and there is no justification to penalise local affordable needs. In addition working again with NLP we demonstrate that the Wharfedale sub market has polarised problems resulting from high house prices,

high land values and the difficulties associated with market entry for new households and households wishing to move into this area. Supply enhancement is the chief market mechanism available to begin to resolve these problems.

- 5.34 We conclude that the reductions in the requirement distributed to certain of the Airedale settlements and all of the Wharfedale settlements is unsound and not justified by the evidence base contained in the GVA/Edge work and the Habitats Assessment by Urban Edge. This re-distribution process has taken no account of reserve land requirements. The Council have sought to justify their changed distribution by a variety of individual factors applying to individual settlements that does not constitute a consistent overall approach.
- 5.35 The reductions for the Principal Town of Ilkley of 400 dwellings (based on the population baseline assignment) and 500 dwellings compared with the FEDCS are not justified by the evidence the Council are seeking to use. Ilkley as one of the Principal towns is regarded generally in the PDCS as a location for growth and enhancement of its key functions. Ilkley has several roles including its operation as the core service centre for all the Wharfedale settlements. Its very good range of retail and service facilities coupled with its strong public transport connections further support a higher level of growth in this location. Our detailed work to date in this settlement establishes that there is capacity for an enhanced level of growth similar to the housing figures in the FEDCS and that this can be achieved with a series of environmental enhancements. Assistance with the delivery of new infrastructure affordable housing and jobs is further justification for the enhanced levels of development.
- 5.36 Our work at Addingham justifies a higher level of local housing provision coupled with green infrastructure and habitat enhancement and limited adjustments to the Green Belt boundary.
- 5.37 We have produced a revised distribution table which applies the additional overall requirement we estimate of 4,900 dwellings within the plan period but restricts this distribution to the Principal Towns, the Local Growth Centres and the local service centres. The level of growth in the Regional City has not been adjusted from the figures contained in policy HO3 as, for the reasons summarised below, we consider these already substantial figures to be challenging. The Regional City would on this basis take 61% of the growth and not 68%.
- 5.38 We do not seek to reduce the general primacy and significance of the Regional City's contribution however our assessment of five year land supply site contributions and site and market characteristics of those sites which have been identified as contributors for many years reflects certain of the problems of delivery in these poorer market areas. Actions to improve infrastructure of all types are necessary to lift these areas and to make some of these sites more attractive. Others will remain heavily constrained and will not be developed. On this basis and our assessment of the delivery levels and rates from the main growth areas we consider that lower levels of housing delivery will be realised during the first half of the plan period and the enhancement of performance will be dependent on the delivery of key infrastructure, environmental enhancements, and transformational projects with high design qualities.

5.39 The table and explanatory notes on the following pages present the results of these adjustments to the housing distribution. In carrying out this exercise we realise that there are imperfections in all such approaches. However it is important to stress that the overall adjusted requirement figure for the District is still regarded as a lower threshold of what may be required as monitoring of the Local Plan is progressed. Also no specific allowance for a reserve land supply figure is contained in these adjusted numbers. An additional five year land reserve for housing would equate to $5 \times 2,500 = 12,500$.

Table: Revised housing distribution to the settlement hierarchy based on the enhanced housing

Settlement	Further Engagement Draft Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Distribution (February 2014)	Objectors Proposed Redistribution
The Regional City of Bradford				
Bradford City Centre	3,500	293	3,500	3,500
Shipley and Canal Road Corridor	3,000	115	3,200	3,200
Shipley	2,000	1,485	1,250	1,250
North East	5,000	7,436	4,700	4,700
South East	6,000	4,878	6,000	6,000
South West	4,500	7,894	5,500	5,500
North West	4,000	6,222	4,500	4,500
Principal Towns				
Keighley	5,000	4,066	4,500	5,700
Bingley	1,600	1,470	1,400	1,600
Ilkley	1,300	1,194	800	1,250
Local Growth Centres				
Silsden	1,700	633	1,000	1,650
Steeton with Eastburn	800	346	700	1,150
Queensbury	1,500	734	1,000	1,300
Thornton	700	483	700	1,150
Local Service Centres and Rural Areas				
Addingham	400	263	200	275
Baildon	550	1,351	450	600
Burley in Wharfedale	500	518	200	275
Cottingley	300	395	200	275
Cullingworth	200	215	350	500
Denholme	450	225	350	500
East Morton	150	109	100	150
Harden	150	133	100	150
Haworth	600	483	500	650

Menston	900	362	400	550
Oakworth	250	315	200	275
Oxenhope	150	155	100	150
Wilsden	300	325	200	275
TOTAL	45,500	42,100	42,100	47,075

5.40 On behalf of our house builder clients under policy HO1 Housing Requirement we have argued for an enhanced total of at least 47,000 dwellings for the plan period 2013- 2030 i.e an increase of 4,900 on the estimate provided by the Council.

5.41 In our evidence we have argued that the housing requirement figures for the Regional City of Bradford should be maintained at the level proposed in the Publication Draft Core Strategy. This results in a residual housing requirement of 18,350 to be distributed across the Principal Towns, Local Growth Centres and Local Service Centres ($47,000 - 28,650 = 18,350$). Of this residual housing requirement figure approximately 50% (8,550) is distributed to the three Principle Towns; the remaining circa 50% requirement has been split between the Local Growth Centres and Local Service Centres (5,250 and 4,625 respectively).

5.42 We have set out in our evidence the arguments for enhancing provision within the Wharfedale settlements based both on the housing requirement analysis and appraisal of the Habitats Regulations Assessment.

POLICY HO4 – PHASING THE RELEASE OF HOUSING SITES

5.43 This type of managed (phased) release policies were used in the production of the reviews of the West Yorkshire authorities UDP's and they proved to be a prime contributor to under-delivery against annual housing requirement targets. Given the scale of the District's housing requirement, its housing market problems and the increasing gap between need and supply the phasing and implied trigger mechanism approach is wholly counter-productive and against national policy. On this basis policy HO4 is unsound. Division into two rigidly timed phases is a very negative step. The fact that no indicators are provided in the table at the end of the policy adds to the conclusion that this proposed approach is poorly thought through, unjustified and would be very difficult to monitor.

5.44 Some sites will have long gestation and delivery periods which necessitates their early release to ensure full delivery outcomes within the plan period. Such an approach is likely to inhibit the ongoing achievement of a five year supply.

POLICY HO5 DENSITY OF HOUSING SCHEMES

5.45 On a number of sites in Bradford it has not proved possible due to access, topography and other constraints to achieve the minimum net density target of 30 dwgs/hectare also contained in the current development plan. This target, if it is to remain as a statement of policy requires more clarification and qualification.

HO6- MAXIMISING THE USE OF PREVIOUSLY DEVELOPED LAND

5.46 The granting of priority to brownfield sites is contrary to the NPPF as this states that brownfield development should be encouraged. This clearly implies that brownfield development should proceed in tandem with greenfield development. Historically high brownfield land development rates have been achieved in Bradford under national and local policy guidance which did then prioritise such development under the much earlier planning policy guidance contained in PPG3. The use of an indicative and aspirational target for brownfield development of around 50% is supported and performance against this target can be monitored as the plan period progresses. The target should be used as a guideline and not a punitive policy instrument. The policy as worded is unsound as it is contrary to national policy.

POLICY HO7 –HOUSING SITE ALLOCATION PRINCIPLES

5.47 The policy content in the PDSCS does not constitute clear policy criteria for the site selection process. There are some contradictions arising from the selected principles. For example greenfield and Green Belt sites will have the greatest ability to provide funding through CIL or section 106 agreements for necessary supporting infrastructure and this will be an enhanced position in the higher value areas of Airedale and Wharfedale.

5.48 Selecting sites accessible to quality public transport services should be supported but this runs counter to the earlier statements regarding the avoidance of the use of transport as a key determinant of development location in the Bradford context. This policy is also contrary to the content of the phasing policy HO4.

5.49 This approach needs considerable further thought and re-working so that it is consistent with other draft policies and the NPPF and the Sustainability Appraisal. A clear site selection methodology is necessary.

POLICY HO11- AFFORDABLE HOUSING

5.50 The general proportions set out in part B of the draft policy are supported on the basis that these are treated as maxima and allowance is made for viability appraisal where these targets cannot be met.

5.51 The reduction of the affordable housing dwelling numbers threshold in Wharfedale and certain other villages from 15 dwellings to 5 dwellings is unrealistic and will act as a major deterrent to the delivery of smaller site by small builders. It is important following the recession to encourage small house builder performance to deliver on these small and often difficult sites bearing in mind that this sector is much reduced as a result of many companies in Bradford going into administration during the recession.

POLICY EN2 – BIODIVERSITY AND GEODIVERSITY

5.52 PART A :- A number of policies in the PDSCS refer to the protection of the North and South Pennine SAC/SPA and adjacent areas based on the Habitats Assessment carried out by Urban Edge. Policies SP8, AD1 (Airedale) and WD1 (Wharfedale) are subject to earlier detailed comments in this submission. The Habitats

Assessment has been used as a key contributory tool to reduce the housing provision in Wharfedale settlements and in certain Airedale settlements.

5.53 We object to policy EN2 on similar grounds and conclude that it fails a number of the soundness tests. It is however not clear whether part A of policy EN2 is meant to apply to the protection zones identified in policy SP8 or to development within the actual designated areas. A nil adverse effect test does not appear to allow for mitigation or compensation and the wording of this policy does not comply with the policy content of the NPPF in particular paragraphs 113, 114, 117 and 118. The approach taken by the Council does not constitute a positive and integrated approach which will allow for development where habitat mitigation, enhancement and connectivity can be achieved to an extent which over-rides the initial objection in principle.

PART B: SETTLEMENT SPECIFIC COMMENTARY

ADDINGHAM			
Further Engagement Draft Housing Distribution (October 2011) 400	Baseline Distribution based on Population 263	Publication Draft Housing Distribution (February 2014) 200	Objectors Proposed Redistribution 275
SUSTAINABILITY			
General		<p>Addingham is identified as a Local Service Centre, however it is a larger village than a number of the others in fourth tier of the Settlement Hierarchy with a strong community and a good range of services.</p> <p>The nearest train station to Addingham is that of Ilkley, some 5km away. Existing and proposed properties within the settlement are within 400m of good frequency bus services linking the village with the principle towns of Ilkley, Keighley and Skipton.</p>	
Social		<p>Addingham has a good range of local services and facilities including a doctor's surgery, pharmacy, nursery, primary school, a range of shops on Main Street, the village centre. The nearest secondary school is Ilkley Grammar School, some 5.6km away. The Growth Study identifies that there is sufficient capacity within both the primary and secondary schools to meet forecast need in the short term. Ilkley Grammar School is expected to have capacity issues by 2018 but a replacement school is being planned to the east of Ilkley.</p> <p>There are a number of small businesses in Addingham, located within the small employment area towards the western edge of town.</p> <p>There is a significant shortfall of affordable houses, as identified by the Bradford Strategic Housing Market Assessment (2010) within the Wharfedale sub area, this equates to a net annual shortfall of 120 dwellings. The evidence submission by NLP and Johnson Brook establish a strong case for enhanced housing provision in Wharfedale. Wharfedale is an extremely attractive housing market sub area and it can and must continue to play a key role in the Bradford economy by providing for a wide choice of family housing as well as catering for its own needs including affordable housing provision. Currently demand for housing exceeds supply and there is pressure on existing stock driving up prices.</p>	
Environmental		<p>Addingham is partially located within the 400m to 2.5km SPA Buffer zone. Land along the eastern boundary is Flood Zone 3 however, land to the north, west and south is Flood Zone 1. Master planning work indicates how residential development can be provided in combination with new and enhanced Green Infrastructure and habitat.</p>	
Economic		<p>There are significant levels of out-commuting from Addingham, both within and out of the district (31.2%). Whilst a higher than average number of journeys to work are made by car, there is also higher than average levels of commuting by train from Ilkley to Leeds and Bradford. The local centre is concentrated around Main Street and focuses on</p>	

	convenience goods and services for the local residents. There is some scope for new employment development.
Constraints/ Opportunities	Topography to the north west and west is a constraining influence. The by-pass provides an enclosing feature and there is scope for development on parts of the open fields to the north and closer to village services.
Need for Green Belt Release	The May 2013 SHLAA Update identifies that there are very limited development opportunities within Addingham on brownfield land, amounting to potential of just 22 dwellings. The Growth Study identifies that the Green Belt surrounding Addingham has a limited contribution to the West Yorkshire Green Belt. Sustainable Green Belt releases can be achieved in Addingham while still preventing the merging of settlements, not encouraging ribbon development or encroachment into the open countryside.
<u>Comments/ conclusions</u>	
<p>There is an identified housing need within Addingham, with residents particularly concerned over the level of available affordable housing (Settlement Study, 2011). Development opportunities within the wider framework of the village will address these concerns. Residential development will ensure that the community facilities continue to have a catchment to support them as well as supporting new community facilities, further public transport enhancements, new green infrastructure and additional/enhanced habitat.</p>	

BAILDON			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
550	1,351	450	600
SUSTAINABILITY			
General	<p>Baildon is identified as a Local Service Centre and sits on the fourth tier of the Settlement Hierarchy.</p> <p>Baildon rail station services the town and provides approximately half hourly services to both Bradford and Ilkley. There are bus services to local, town and city centres. The Transport Study highlights the Airedale transport corridor as having limited capacity.</p>		
Social	<p>Baildon has three primary schools. The nearest secondary school is Titus Salt, some 2.9km away. The Growth Study indicates that there is primary school capacity however the secondary school will not be able to meet requirement by 2015/16.</p> <p>As outlined in the 2010 SHMA there is a net annual affordable housing shortfall of 103 dwellings with the Bingley and Shipley sub housing market area. There is also a demand for most types of housing, which is exceeding supply, particularly for detached and four bed houses.</p>		
Environmental	<p>North Baildon is partly located within the 400m to 2.5km SPA buffer zone. The River Aire abuts the southern settlement boundary where there are areas of flood risk 2 and 3.</p>		
Economic	<p>Baildon has limited existing local economic development; the main employment focus is Shipley. There are significant levels of out commuting from Baildon, including to outside the District. Travel to work distances in Baildon are higher than District average.</p> <p>The local centre is concentrated around the Towngate roundabout and incorporates outlets on Northgate, Browgate and Westgate. The centre includes a variety of convenience and comparison shops. The Growth Study considers the centre as healthy and performing well in its role serving the community.</p>		
Constraints/ Opportunities	<p>The topography to the north, north west and west of the settlement provide some constraint to development however the landform to the south, north east and east provides opportunities for development.</p>		
Need for Green Belt Release	<p>The 2013 SHLAA Update demonstrates that there is some potential for development on brownfield sites, this equates to a capacity of 138 dwellings. The Growth Study highlights that the Green Belt surrounding Baildon makes a significant contribution to the West Yorkshire Green Belt. Sustainable Green Belt releases will be needed to achieve the proposed level of development.</p>		

Comments/ conclusions

Baildon has a fairly good range of local community facilities and services but is partially dependant on Shipley. Local facilities are currently proportionate to the settlements existing population and convenience needs. Carefully planned development will ensure existing community facilities, services and businesses are continued to be supported. New development in this location will also help to support wider regeneration within the Canal Road Corridor by providing homes for workers.

BINGLEY			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
1,600	1,470	1,400	1,600
SUSTAINABILITY			
General	<p>Bingley is identified as a Principle Town and sits on the second tier of the Settlement Hierarchy. The town is physically contained by upper steep valley sides and development opportunities are mainly concentrated within the lower valley slopes.</p> <p>There is a centrally positioned railway station which serves the town centre. Services run to Leeds, Skipton and Bradford. Bingley has high frequency bus services with links to the town of Keighley and Shipley, Bradford and Halifax.</p> <p>The Bingley relief road has further reinforced the good connectivity to the town via the Airedale corridor. The relief road provides additional carrying capacity.</p>		
Social	<p>Within the town and surrounding area there are six primary schools and two secondary schools. The Growth Study highlights that within the catchment area primary school places will be exceeded by 2013. Secondary school places are predicted not to be able to meet requirements by 2015/2016.</p> <p>The 2010 SHMA highlights that there is a high demand for all housing tenure types. There is a demand for all property types apart from terraced housing. The Bingley and Shipley sub area has an annual net shortfall of 103 affordable dwellings.</p>		
Environmental	<p>The north of Bingley falls within the 400m to 2.5km buffer zone of the South Pennine SPA/SAC. The River Aire runs along the western settlement boundary and Loadpit Beck runs parallel along the east. These flood zone 3 areas meet to the south of Bingley.</p>		
Economic	<p>Entrepreneurship within Bingley is above average for the District. The employment opportunities are significant with two of the Districts top 30 employers residing within Bingley. There is considered to be a strong employment base and capacity for further employment opportunities.</p>		
Constraints/ Opportunities	<p>Topography to the east, north west and west is likely to be a constraint on development opportunities however there are opportunities to the south, east and immediate north of the settlement. A long standing opportunity for development between Bingley and Micklethwaite will be realised in the short term.</p>		
Need for Green Belt Release	<p>The 2013 SHLAA Update identifies that there is some potential for development on previously developed land, this provides maximum a capacity of approximately 600 dwellings. In order to meet the level of proposed development sustainable Green Belt deletions will be necessary; this can be achieved whilst retaining the main functions of the Green Belt around the town.</p>		

Comments/ conclusions

Bingley already has a very good range of services and existing community facilities that will continue to be supported through the delivery of new homes. As identified above there are capacity issues within primary schools and Secondary schools and housing development in Bingley can contribute to the investment needed to address these shortfalls. Housing development can also provide investment opportunities for the improvement of public transport services.

There is significant demand for housing and a shortfall in the provision of affordable homes in the area, these issues can be addressed through carefully planned residential development.

Furthermore, new housing development would have positive benefits for the further regeneration of the Aire Valley area and provide opportunities for attracting new employment to Bingley improving the self-containment of the town.

CULLINGWORTH			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
200	215	350	500
SUSTAINABILITY			
General	<p>Cullingworth is identified as a Local Service Centre and sits in the fourth tier of the Settlement Hierarchy.</p> <p>The nearest railway stations are in Bingley, Crossflats and Keighley, all approximately 4km away. However there are both bus services to both local and district centres.</p> <p>The Transport Infrastructure Plan identifies that there is capacity within the existing transport network.</p>		
Social	<p>There is one primary school and one secondary school in Cullingworth. The Primary school is expected to exceed capacity by 2013, whilst the secondary school will have sufficient capacity to 2018.</p> <p>There is a limited range of community facilities and services with one doctors surgery and a post office within the village. The 2010 SHMA demonstrates an annual net affordable housing shortfall of 103 dwellings. Also highlighted is that demand exceeds supply in all housing tenure types, particularly 3 bed properties and detached houses.</p>		
Environmental	<p>Cullingworth is not situated within the 400m to 2.5km SPA buffer zone. There are some areas of high flood risk to the north of Cullingworth.</p>		
Economic	<p>Cullingworth centre offers convenience goods and local amenities such as a fish and chip shop and pubs. The nearest town centres are Keighley, approximately 4km away, and Bingley, approximately 3.5km away.</p> <p>There are 3.6 working age residents to each local job. Key employment locations in proximity to Cullingworth are Keighley, Bingley, Shipley and Bradford; as a result there is significant out-commuting. There is existing capacity for employment opportunities with Cullingworth through the Mannywells Industrial Estate.</p>		
Constraints/ Opportunities	<p>The topography to the east and north of the settlement provides some development constraint however the landform to the west, south and east provides opportunities for development.</p>		
Need for Green Belt Release	<p>The 2013 SHLAA Update demonstrates that there is some potential for development on brownfield sites however there is a capacity of approximately 120 dwellings. The Growth Study indicates that the Green Belt at Cullingworth has only a limited contribution to the role of the West Yorkshire Green Belt. Sustainable Green Belt releases can be achieved to facilitate growth.</p>		

Comments/ conclusions

As detailed above there is an identified need for housing within Cullingworth, particularly in order to contribute to the shortfall of affordable housing. Housing development will ensure that the existing local community facilities and services continue to be supported and present investment opportunities for necessary open space and recreation provision and primary and secondary school places.

ILKLEY			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
1,300	1,194	800	1,200
SUSTAINABILITY			
General	<p>Ilkley is identified as a Principal Town and sits in the second tier of the Settlement Hierarchy. There is a need to create a more balanced community via new housing supply and an expansion of local job opportunities.</p> <p>There are two railway stations at Ilkley, Ilkley and Ben Rhydding. These provide half hourly services to Leeds and Bradford. There is also a bus/rail interchange in Ilkley that provides good connections to the key settlements in the District and into North Yorkshire and the Yorkshire Dales.</p> <p>Further employment opportunities need to be created in the town to widen the economic base and provide shorter journeys to work.</p>		
Social	<p>Ilkley has 4 primary schools and a secondary school. The Bradford District Education Organisation Plan suggests that within the catchment area there is sufficient existing capacity within both the secondary and primary schools to meet forecast demand. Ilkley Grammar School is identified as having capacity issues by 2018. Plans are being progressed for a replacement Grammar School with expanded capacity to serve the town and Wharfedale settlements.</p> <p>The 2010 SHMA identifies the Wharfedale sub area as having a net annual shortfall of affordable housing of 120 dwellings. Furthermore the demand for market housing far exceeds supply, particularly 3+ bedrooms and private rented property. In addition there is also a need for 2 bed dwellings.</p> <p>There is a wide and diverse range of community facilities and services in Ilkley including community centres, post office and delivery office, library.</p>		
Environmental	<p>The southern edge of the town lies within the 400m SPA protection buffer zone with almost the remainder of the settlement within the 400m to 2.5km SPA buffer zone. The River Wharfe runs through the valley bottom, separating Ilkley from Middleton. There is a significant area of flood risk within the valley bottom.</p>		
Economic	<p>The town centre of Ilkley provides a good range of both convenience and comparison goods shops. The settlement is also a thriving centre for leisure and tourism.</p> <p>There is significant economic potential in this area which exists in the form of established businesses and entrepreneurs wishing to establish new businesses.</p> <p>There is a high demand for employment land within Ilkley which currently cannot be fulfilled. A new business park is therefore proposed.</p>		

Constraints/ Opportunities	<p>The topography and landscape to the north and south of Ilkley are significant constraints on development. The South Pennine Moors lie to the south of the settlement and the Nidderdale AONB to the north. Significant river washlands require protection from development in the low lying areas alongside the River Wharfe. However there are significant opportunities for growth to the east and west of the town, which are free of these major constraints.</p> <p>A number of local transport initiatives are required to further improve walking, cycling and public transport.</p>
Need for Green Belt Release	<p>The May 2013 Update identifies that there are some opportunities for development on brownfield sites, these are estimated by the Council to have a capacity of 375 dwellings. We would suggest that the brownfield development capacity might be increased to a total of circa 500 dwellings. The Growth study identifies that the Ilkley Green Belt had a limited contribution to the role of the Leeds/Bradford Green Belt. In order to achieve the level of development proposed in Ilkley, there is need for sustainable Green Belt releases.</p>
<p>Comments/ conclusions</p> <p>There is scope for carefully designed and controlled expansion to the east and west of the town without materially harming its key environmental qualities. This can be achieved via greenfield urban extensions into the Green Belt to the east and west of the town to deliver residential development, a new business park and a new secondary school, with very attractive new green infrastructure. Removing land from the Green Belt is a necessary approach because of the exceptional circumstances of employment; housing and infrastructure need and supply shortage of homes and jobs.</p>	

KEIGHLEY			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
5,000	4,066	4,500	5,700
SUSTAINABILITY			
General	<p>Keighley is identified as a Principal Town and has strong foundations in terms of the range of jobs, services and a dedicated local catchment area.</p> <p>Keighley is well serviced by public transport with rail and bus services accessing both local town and city centres. As a result there is higher than District average levels of commuting via sustainable modes of transport. The Airedale Corridor serving Keighley has been identified by the Bradford Transport Study as having potential network capacity issues. Measures identified within the study to minimise capacity issues were Park and Ride and bus priority measures along the A650.</p>		
Social	<p>There is a very good range of services and facilities within Keighley. Retailing offers both convenience and comparison goods with a range of superstores.</p> <p>The 2010 SHMA identifies that the Keighley and Worth market area has a current net balance in affordable housing provision in the short term. It identifies that there is a shortage of owner occupied detached and semi-detached properties, particularly 3 bed properties.</p> <p>There are 17 primary schools, 3 secondary schools and a large college within the Keighley area. There is sufficient secondary school capacity until at least 2018 however primary school capacity will be at 1% by 2013 in Keighley 1 catchment area and Keighley 2 catchment area will have surplus spaces of 3.1% by 2015.</p> <p>There are mixed levels of deprivation across Keighley, almost half the population of Keighley West and just over 80% of Keighley Central wards fall within the 20% most deprived neighbourhoods in England. As a result Keighley lies within the Airedale Regeneration Priority Area.</p>		
Environmental	<p>The area to the north east of Keighley lies within the SPA 2.5km buffer zone. Keighley lies along the River Worth and River Aire, as a result there are areas of flood zone 3 to the north of the settlement and through the town, running north to south.</p>		
Economic	<p>The Bradford Employment Land Review outlined that there is a high demand for B2 and B8 premises.</p> <p>Keighley is the largest town centre outside of the City Centre. The Retail and Leisure Study identifies the centre to have a good range of services and retail offer however vacancy rates are high in the older and smaller shop units.</p> <p>Keighley offers a large employment base. The average distance travelled to work is below the District's average of 10.1km.</p>		
Constraints/ Opportunities	<p>The town is constrained in terms of topography and high flood risk zones in the valley bottom should be avoided. The 'mill conversion' market has limitations but there are opportunities for well-planned mixed use schemes involving conversion and selective demolition subject to</p>		

	viability testing and potential grant assistance.
Need for Green Belt Release	The SHLAA 2013 update identifies that previously developed sites have the potential to deliver 1,854 dwellings. Therefore in order to deliver the proposed level of development as set out in the Core Strategy there will be a need for sustainable Green Belt releases. The Growth study identifies locations to the north east, west and south west as most appropriate given the good accessibility to social and economic facilities and services.
<u>Comments/ conclusions</u>	
<p>As a settlement Keighley is a strong and well established with an excellent range of existing community and social facilities and services. Given the high levels of deprivation in the inner area there is a clear need for investment and regeneration. This can be assisted by well-planned mixed use regeneration schemes as well as the general growth of the town.</p>	
<p>Carefully planned new housing development at the level proposed will make a significant contribution towards the investment needed to provide additional educational capacity, health facilities and open space.</p>	
<p>New housing development would help to deliver improved public transport services, including park and ride and bus priority projects.</p>	
<p>Development will increase economic opportunities by encouraging new businesses and employment opportunities in the area and will ensure the continued support of the town centres vitality and viability.</p>	

QUEENSBURY			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
1,500	734	1,000	1,300
SUSTAINABILITY			
General	<p>Queensbury is identified as a Local Growth Centre and sits in the third tier of the settlement hierarchy.</p> <p>The nearest train station to Queensbury is Bradford Interchange or Bradford Forster Square some 8.2 km away. However, there are high frequency bus services between Halifax and Bradford. The Bradford Transport Study identifies that the Queensbury and Bradford corridor is not a key corridor likely to experience transport capacity issues.</p>		
Social	<p>There are 4 primary schools and 1 secondary school with Queensbury. It has been identified that within the primary school catchment area there will be sufficient capacity until at least 2015. However with the secondary school catchment area, by 2017 based on current predictions, there would be a shortfall of over 300+ places.</p> <p>The 2010 SHMA has identified an annual net affordable housing shortfall of 255 dwellings within the City west suburb. In particular there is a shortage of 3 bed-room dwellings. Overall it is noted that demand exceeds supply of detached properties and there is an identified shortfall in owner occupied properties of all sizes.</p> <p>There is a good range of existing local community facilities and services.</p>		
Environmental	<p>Queensbury lies outside of the 400m to 2.5km SPA buffer zone and there are no flood risk zones 2 or 3 within or surrounding the settlement.</p>		
Economic	<p>The Bradford Ward Economic Profile highlights a total of 2,200 local jobs. This results in a ratio of 5.5 working age people per local job. There are some small scale peripheral employment sites which are identified in the Employment Land Review as being important.</p>		
Constraints/ Opportunities	<p>Topography to the north, small watercourse in the west and Shibden Dale to the south are constraining influences for development. There are opportunities to the southwest and on the plateau of land on which the existing settlement of Queensbury is set for further development.</p>		
Need for Green Belt Release	<p>The May 2013 SHLAA Update identifies that there are some opportunities for development on brownfield land, this equates to a capacity of 194 dwellings. The Growth Study identifies that the Green Belt surrounding Queensbury significantly contributes to the role of the West Yorkshire Green Belt. The Green Belt performs a significant role in preventing neighbouring settlements from merging into one another, particularly Illingworth, Holmfirth and Mountain. However, contained Green Belt development, in sustainable locations, can be achieved while still maintaining adequate separation distances between settlements.</p>		

Comments/ conclusions

There is a very good range of existing community and social facilities and services in Queensbury. Carefully planned new housing development in this location may make a contribution to the investment needed to address shortfalls in education provision and further enhance public transport services.

New homes would also support existing businesses and the local centre expansion as well as address the identified housing need and demand in the area, as outlined above.

SILSDEN			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
1,700	633	1,000	1,650
SUSTAINABILITY			
General	<p>Silsden is identified as a Local Growth Centre and sits within the third tier of the Settlement Hierarchy.</p> <p>Silsden is fairly well connected to surrounding settlements by local bus services however the town would benefit from a high frequency service. The nearest train station is the Silsden and Steeton station some 1.2km from the settlement; this has a large park and ride facility. Train services run to Skipton, Bradford and Leeds.</p> <p>Silsden is within the Airedale Corridor, a key movement corridor, but one identified as having potential capacity issues.</p>		
Social	<p>Silsden has two primary schools but no secondary school. The nearest secondary school is University Academy Keighley, some 7.8kms away. The capacity of school space will be reached by 2015.</p> <p>Silsden falls within the Wharfedale- sub area as identified within the SHMA (2010) where there is a net annual shortfall of 120 affordable dwellings. Whilst there is sufficient 1 and 2 bedroom properties to meet the supply, demand for other housing tenures exceeds supply and there is particular pressure for detached houses.</p>		
Environmental	<p>The east of Silsden is situated within the 400m to 2.5km SPA buffer zone. A significant area of land to the south of Silsden is flood zone 3 where Silsden Beck, River Aire and the Leeds/Liverpool Canal connect.</p>		
Economic	<p>There are significant levels of out-commuting from Silsden with 31.2% commuting out of the District. The Bradford Ward Economic Profiles identify that there are 7,700 local jobs.</p>		
Constraints/ Opportunities	<p>Development in Silsden has the potential to help facilitate transport improvements but these need to be carefully planned and programmed for early implementation.</p>		
Need for Green Belt Release	<p>The SHLAA 2013 update identifies only a small amount of development potential on brownfield land, a capacity for just 61 dwellings; this requires further review. The Growth Study identifies that the Green Belt at Silsden provides a limited contribution to the West Yorkshire Green Belt but has more significance locally through restricting sprawl and ribbon development. Green Belt extensions will be required.</p>		

Comments/ conclusions

Carefully planned housing development in this location would provide some of the investment needed to help address shortfalls in both the primary and secondary school places, as well as other community facilities such as public open space.

Housing development will meet the need of housing demand in Silsden, particularly that of affordable housing as well as providing support to existing businesses which are important to the local economy. Silsden has been selected as a Local Growth Centre so that it can contribute to the wider District housing requirement.

STEETON WITH EASTBURN			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
800	346	700	1,150
SUSTAINABILITY			
General	<p>Steeton with Eastburn is identified as a Local Growth Centre and sits within the third tier of the settlement hierarchy.</p> <p>Steeton and Silsden railways station serves the town and is located to the north east of the settlement. This provides services to Skipton, Bradford and Leeds. Steeton with Eastburn is also well served by buses.</p> <p>Steeton with Eastburn is situated within the Airedale Corridor, a key regeneration and movement corridor.</p>		
Social	<p>There are two primary schools within Steeton with Eastburn however the closest secondary school is University Academy Keighley, some 4.7km away and South Craven School in Sutton-in-Craven, some 4.3km away. It is highlighted within the Growth Study that University Academy Keighley has sufficient capacity however the School Organisation Plan for South Craven catchment area indicated that capacity will be exceeded by 2015.</p> <p>There is a good range of existing local services and community facilities including Airedale Hospital, located west of the settlement.</p> <p>The 2010 SHMA identifies the Wharfedale sub area as having a net annual shortfall of affordable housing as 120 dwellings. Furthermore the demand for market housing far exceeds supply, particularly 3+ bedrooms and private rented property.</p>		
Environmental	<p>There is an extensive area of flood risk to the north of the settlement as the River Aire runs along this boundary.</p>		
Economic	<p>Steeton and Eastburn experiences high levels of out-commuting for work, both within the District and out of the District. Given the excellent connectivity provided by the rail link, Steeton experiences higher than District average journeys to work by train.</p> <p>There are a number of large scale employers and many local businesses with the Steeton with Eastburn area, including the Airedale NHS Trust. According to the Bradford Ward Economic Profiles there are 7,700 local jobs with a ratio of 1.6 working age population per job.</p>		
Constraints/ Opportunities	<p>The extensive area of flood risk to the north of the village provides some constraint to development in this area. The topography of the settlement and surrounding area allows for significant development opportunities.</p>		

Need for Green Belt Release	The SHLAA May 2013 Update highlights there is only very limited capacity for development on previously developed land, this equates to a capacity of just 67 dwellings. Sustainable Green Belt release can accommodate the delivery of new houses while still maintaining adequate separation between existing settlements.
<u>Comments/ conclusions</u> New housing development would ensure that existing community and social facilities and services continue to be supported with some expansion to create a local centre. New housing would help to meet the shortfalls in both education places and public open space and recreation facilities. New housing could provide investment opportunities to facilitate better bus links to the train station and a potential expansion of the rail park and ride.	

THORNTON			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
700	483	700	1,150
SUSTAINABILITY			
General	<p>Thornton is identified as a Local Growth Centre and sits within the third tier of the Settlement Hierarchy.</p> <p>The nearest train stations to Thornton are Bradford Interchange and Bradford Forster Square almost 8km from the village. There are high frequency bus services which connect to Halifax and Bradford however, journey's to work by car are higher than the District average.</p>		
Social	<p>There is one primary school within the settlement of Thornton. This has been identified as at capacity now, despite a recent expansion. A new primary school will be required as extension capacity has been exhausted. Thornton Grammar school is located to the east of the settlement, approximately 2km from the centre of the village. However secondary school capacity within the Bradford South confederation area is likely to be exceeded in 2013.</p> <p>There is a good range of existing community facilities including post office, library, community centre and medical centre.</p> <p>The 2010 SHMA identifies that the demand for most types of housing tenure exceeds the supply. The City West sub-area has a net shortfall per annum of 185 affordable homes.</p>		
Environmental	<p>The west of Thornton is located within the 400km to 2.5km SPA Buffer Zone as identified within the Habitats Assessment. There are small areas of Flood Zone 2 and 3 situated along the water courses of Pitty Beck and Clayton Beck.</p>		
Economic	<p>There are very few local jobs available, just 1,800 according to the Bradford Ward Economic Job profiles. The Growth Study identifies that there are 6.8 working age residents per local job. As a result there are high levels of out-commuting for work and Thornton serves as a commuter town to Bradford and Halifax. However the commuting distance to Bradford City Centre and adjoining employment zones is very short.</p> <p>The service centre of Thornton performs well according to the Retail and Leisure Study, providing predominantly convenience facilities and services.</p>		
Constraints/ Opportunities	<p>Development further to the north and south of Thornton may be constrained by the steep slopes of the valley sides.</p>		
Need for Green Belt Release	<p>The May 2013 SHLAA update indicates there is some potential for development on brownfield sites, providing a capacity of 149 dwellings. There are some significant opportunities for sustainable Green Belt release surrounding the village. Green Belt releases can be made whilst still maintaining the separate distances between neighbouring settlements.</p>		

Comments/ conclusions

New homes would assist with addressing the identified shortfall in affordable homes and go some way to meet the demand for houses. As a settlement with good bus connections and short commuting distances to Bradford, development at this proposed level will support the wider economic growth and regeneration of the City Centre. New employment opportunities will be attracted by the level of housing. Sustainable Green Belt releases can be made whilst maintaining separation between Thornton and neighbouring settlements.

WILSDEN			
Further Engagement Draft Housing Distribution (October 2011)	Baseline Distribution based on Population	Publication Draft Housing Distribution (February 2014)	Objectors Proposed Redistribution
300	325	200	275
SUSTAINABILITY			
General	<p>Wilsden is identified as a Local Service Centre and sits within the fourth tier of the settlement hierarchy.</p> <p>The nearest train station is 4km away in Bingley. Wilsden is served by local bus services to Bingley, Bradford and Eldwick however this is not a high frequency bus service. As a result there are higher than District average car journeys to work.</p>		
Social	<p>Wilsden has one primary school which is identified as likely to have a primary school capacity shortfall within the catchment area by 2013. Belle Vue the nearest high school is likely to exceed capacity by 2016. Village services include a health centre, post office, library and community centre.</p> <p>The 2010 SHMA identifies that there is a high housing demand for Wilsden (Bingley and Shipley sub-area) that outweighs the supply across all housing tenures. The sub-area has a net annual affordable housing shortfall of 103 households.</p>		
Environmental	<p>Only a small area of Wilsden to the north east is affected by flood zone 3. Wilsden falls outside of the SPA 2.5km Buffer zone.</p>		
Economic	<p>The nearest town to Wilsden is Bingley, 4km away. Retailing in Wilsden is based on convenience. The Retail and Leisure study (May 2013) recommended Wilsden as a Local Service Centre as a means to attract and expand the retail offer in the town centre.</p> <p>There are limited numbers of local jobs available, the Growth Study identifies that there are 3.4 working age residents per local job. As a result, Wilsden has high levels of out-commuting for work.</p>		
Constraints/ Opportunities	<p>There are some topographical limitations to development but a number of expansion options exist. The village lies beyond the 2.5km SPA buffer zone and there are few areas within flood zones 2 and 3.</p>		
Need for Green Belt Release	<p>The May 2013 SHLAA update demonstrates limited brownfield land for development, with capacity for just 28 dwellings. The Green Belt at Wilsden has a limited contribution to the role of the West Yorkshire Green Belt however is considered more significant locally. However, local sustainable Green Belt releases to accommodate the scale of development proposed within the Core Strategy would not result in the merging of Wilsden with neighbouring settlements such as Cullingworth, Cottingley and Denholme.</p>		

Comments/ conclusions

Development in Wilsden would support the facilities of the village centre and ensure continued vitality and viability. As outlined above, there is a clear housing need and demand, including that for affordable housing. The delivery of housing will help to provide new community facilities such as open space and school places.

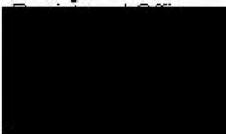
Appendix One

REPRESENTATIONS TO THE BRADFORD CORE STRATEGY PUBLICATION DRAFT (February 2014)

On behalf of Barratt and David Wilson Homes, Miller Homes, Redrow Homes, Skipton Properties and Taylor Wimpey UK

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Appendices

- Appendix 1 Bradford SHMA 2010 - Wharfedale sub-area portrait
- Appendix 2 Bradford SHMA Update 2013 - Wharfedale sub-area portrait

1.0

Introduction

1.1

This statement has been prepared by Nathaniel Lichfield & Partners [NLP] on behalf of CEG Land Promotions Ltd [CEG], Barratt David Wilson Homes - Yorkshire West Division [Barratt] and Redrow Homes [Redrow] following the publication of the Bradford Local Plan Core Strategy – Publication Draft [BLPCS].

1.2

This statement forms a key piece of objective evidence to support the representations being made by CEG, Barratt and Redrow to the proposed distribution of the City-wide housing requirement and in particular the level of housing identified for the Wharfedale sub-area as indicated in policies HO3 and WD1 of the BLPCS.

1.3

This report specifically seeks to explain why there is a strong case to build housing in the Wharfedale area over and above the numbers required by policies HO3 and WD1 of the BLPCS.

1.4

For the purposes of this report, it is worth noting that the consortium considers that the BLPCS objectively assessed housing needs figure as it stands should rise to approximately a 2,500 dpa level based on our assessment of the Core Strategy and OAN for housing from the 2,200 dpa figure currently promoted by the Council. This is set out in a separate document prepared by NLP in response to Policy HO1.

1.5

In preparing this report, NLP has liaised with both Johnson Brook Planning Consultants and Dacres Residential and Commercial Agents to obtain their input into the key market signals affecting the Wharfedale housing market.

2.0

Background

Wharfedale Area

2.1 For the purposes of this report, the greater Wharfedale Area has been taken to mean the combined Menston, Addingham, Ilkley and Burley in Wharfedale sub-area outlined in section 4.3 of the BLPCS¹. However, to avoid confusion it should be noted that this area is often defined geographically differently depending on which publication 'Wharfedale' is mentioned in and the area in the Bradford SHMA 2010 and Update 2013 is slightly different as this also includes the settlement of Silsden.

2.2 For information, Wharfedale has a population of 43,018 and contains 18,538 households according to the Bradford SHMA Update 2013 sub-area portrait. The 2010 and 2013 sub-area portraits are attached as Appendix 1 and 2 and provide useful information as to the make-up of this particular part of the Borough.

2.3 It is difficult to find information on the number of houses developed in recent years in the area.

2.4 However, information contained in the SHLAA update (May 2013) shows that no houses are envisaged to be delivered in the Addingham and Burley in Wharfedale area in the short term since there are no sites "suitable now", with 264 in Ilkley and 400 in Menston envisaged.

2.5 In relation to the BLPCS, Policies HO3 and WD1 allocate 800 dwellings to Ilkley over the plan period, 200 each to Addingham and Burley in Wharfedale and 400 to Menston.

2.6 It is therefore clear that little new housing is likely to come forward in the sub-area in the short term and in the long term comparatively little is planned to come forward in comparison to other areas within the District.

Planning Practice Guidance (PPG)

2.7 Guidance for assessing housing need is contained within the recently published PPG.

2.8 At Paragraph 014 (Reference ID: 2a-014-20140306) it states that:

"Establishing future need for housing is not an exact science"

and that:

"No single approach will provide a definitive answer".

2.9 It continues that plan makers should avoid expending significant resources on primary research (i.e. information that is collected through surveys, focus

¹ The BLPCS contains detailed sub area policies for Wharfedale in this section and Policy WD1.

groups or interviews etc.) and that they should instead look to rely predominantly on secondary data (e.g. Census, national surveys) to inform their assessment of housing need.

2.10 In view of this advice, in looking at the Wharfedale housing market area, NLP has deliberately taken a similar approach to be consistent with guidance.

2.11 At Paragraph 19 of the PPG (Reference ID: 2a-019-20140306: *"How should market signals be taken into account"?*) the guidance suggests that the housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.

2.12 As part of separate representations to Policy HO1, NLP has used the household projections data to demonstrate that the housing need for the entire Bradford Area should rise from 2200 to 2500 dpa. In addition Johnson Brook in their evidence response on behalf of Barratt and Redrow has proposed a re-distribution of the enhanced dwelling numbers to Wharfedale settlements, whilst NLP on behalf of CEG has proposed a revised figure for Burley-in-Wharfedale. Additionally Baker Consultants has provided a full critique of the Habitats Assessment in relation to its impact on development in Wharfedale settlements.

2.13 In the absence of specific household projections for the specific Wharfedale area we have sought to reflect appropriate market signals and other market indicators, again as suggested in the PPG.

2.14 The PPG goes on to suggest in paragraph 19 that:

"Prices or rents rising faster than the national / local average may well indicate particular market undersupply relative to demand.

And that:

Relevant signals may include the following:

Land Prices

Land values are determined by the demand for land in particular uses, relative to the supply of land in those uses. The allocation of land supply designated for each different use, independently of price, can result in substantial price discontinuities for adjoining parcels of land (or land with otherwise similar characteristics). Price premiums provide direct information on the shortage of land in any locality for any particular use.

House Prices

Mix adjusted house prices (adjusted to allow for the different types of houses sold in each period) measure inflation in house prices. Longer term changes may indicate an imbalance between the demand for and the

supply of housing. The Office for National Statistics publishes a monthly House Price Index at regional level. The Land Registry also publishes a House Price Index and Price Paid data at local authority level.

Rents

Rents provide an indication of the cost of consuming housing in a market area. Mixed adjusted rent information (adjusted to allow for the different types of properties rented in each period) shows changes in housing costs over time. Longer term changes may indicate an imbalance between demand for and supply of housing. The Office for National Statistics publishes a monthly Private Rental Index.

Affordability

Assessing affordability involves comparing house costs against the ability to pay. The ratio between lower quartile house prices and the lower quartile income or earnings can be used to assess the relative affordability of housing. The Department for Communities and Local Government publishes quarterly the ratio of lower quartile house price to lower quartile earnings by local authority district.

Rate of Development

Local planning authorities monitor the stock and flows of land allocated, permissions granted, and take-up of those permissions in terms of completions. Supply indicators may include the flow of new permissions expressed as a number of units per year relative to the planned number and the flow of actual completions per year relative to the planned number. A meaningful period should be used to measure supply. If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan. The Department for Communities and Local Government publishes quarterly planning application statistics.

Overcrowding

Indicators on overcrowding, concealed and sharing households, homelessness and the numbers in temporary accommodation demonstrate un-met need for housing. Longer term increase in the number of such households may be a signal to consider increasing planned housing numbers. The number of households accepted as homeless and in temporary accommodation is published in the quarterly Statutory Homelessness release.

2.15 It goes to say in Paragraph 20 (Reference ID: 2a-020-20140306) in relation to "How should plan makers respond to market signals"? that:

"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of

change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections"

2.16 It continues that:

"In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be".

"Market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability"

"The list of indicators above is not exhaustive. Other indicators, including those at lower spatial levels, are available and may be useful in coming to a full assessment of prevailing market conditions. In broad terms, the assessment should take account both of indicators relating to price (such as house prices, rents, affordability ratios) and quantity (such as overcrowding and rates of development)".

2.17 The above clearly suggests that organisations looking at housing need should assess the 6 signals named specifically, assess worsening trends and consider whether larger affordability is needed and additional supply is required amongst other things. With these specific points in mind, NLP have sought to access a range of information, to try to assess the Wharfedale housing market and to see if the housing numbers proposed by the Council are reasonable and justifiable and how they meet housing need for the area.

3.0

Analysis of Available Data

Analysis of 6 key market signal indicators outlined in the PPG

Land Prices

3.1 NLP has found no direct information on Land Prices available to review covering the whole Wharfedale area barring that contained in the *Bradford District Local Plan Core Strategy – Viability Assessment* (September 2013).

3.2 At paragraph 4.5.1 this report indicates:

“a wide range of residual site values reflecting the diversity of market characteristics across the District, with value area 1 (Wharfedale) generating site values of £3.26m per ha (£1.32m per acre), and at the other end of the spectrum, value area 5 (inner Bradford and Keighley), producing negative land values”.

3.3 This is graphically illustrated in the below table.

Table 3.1 Base appraisal results (Base scenario current values)

	Residual site value	Residual site value per ha	20% GDV	20% GDV per ha	Sum available for policy standards
Value Area 1 (Wharfedale)	£4,884,622	£3,256,415	£2,505,420	£1,670,280	£1,586,135
Value Area 2	£2,416,618	£1,611,079	£1,778,040	£1,185,360	£425,719
Value Area 3	£1,319,689	£879,792	£1,454,760	£969,840	£-90,048
Value Area 4	£222,998	£148,66	£1,131,480	£754,320	£-605,654
Value Area 5 (Inner Bradford and Keighley)	£0	£0	£969,840	£646,560	£-646,560

Source: Bradford District Local Plan Core Strategy - Viability Assessment (September 2013)

3.4 What this information shows is that the residual site value per hectare is considerably higher in Wharfedale than the rest of the area, indicating a price premium for land here, a higher demand for land and potentially a shortage of it in this locality.

House Prices / Affordability

3.5 The below, taken from the Bradford SHMA 2013: Wharfedale 2013 – Sub Area Portrait, shows a significant difference between the lower quartile and median house prices in the Wharfedale and Bradford areas. It also illustrates the relative lack of affordability of the Wharfedale area in comparison to Bradford.

House Prices

Table 3.2 House Prices 2013

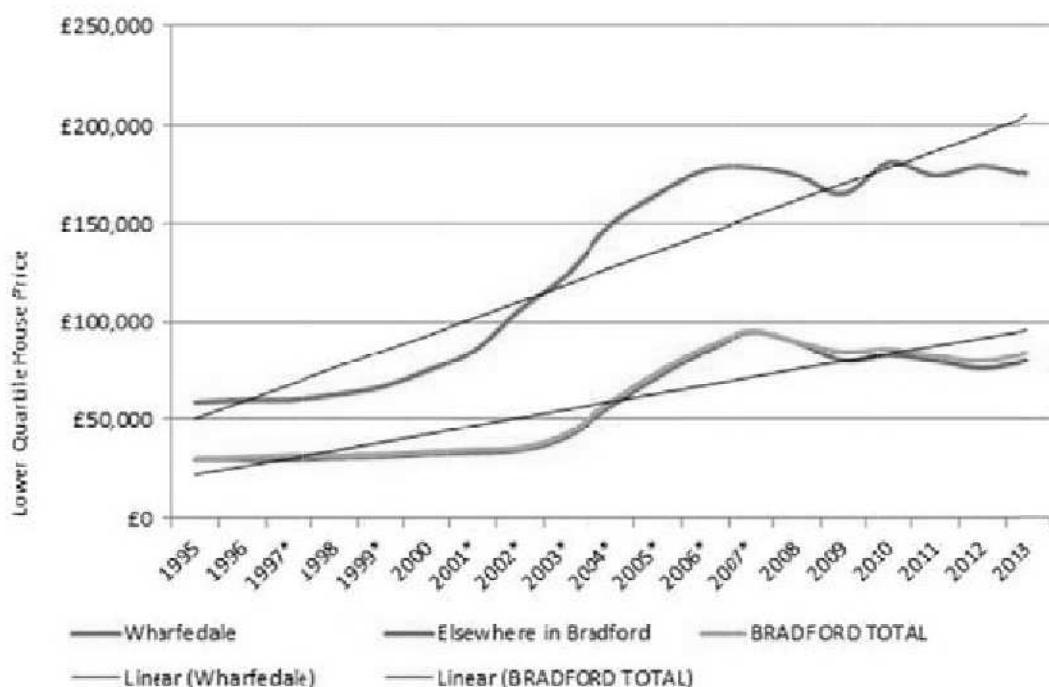
Housing Market 2012	Wharfedale	Bradford
Median House Price	£210,000	£115,000
LQ House Price	£155,000	£80,000
Median Household Income	£29,400	£15,325
LQ Household Income	£11,700	£6,500

Source: Wharfedale 2013 – Sub Area Portrait, Bradford SHMA Update 2013

3.6 This conclusion is further reinforced when looking at data on house prices paid between 1995 and 2014 from the Land Registry.

3.7 The table below shows the average house prices paid in Wharfedale and the rest of Bradford for lower quartile housing.

Table 3.3 Lower Quartile Housing 1995-2013



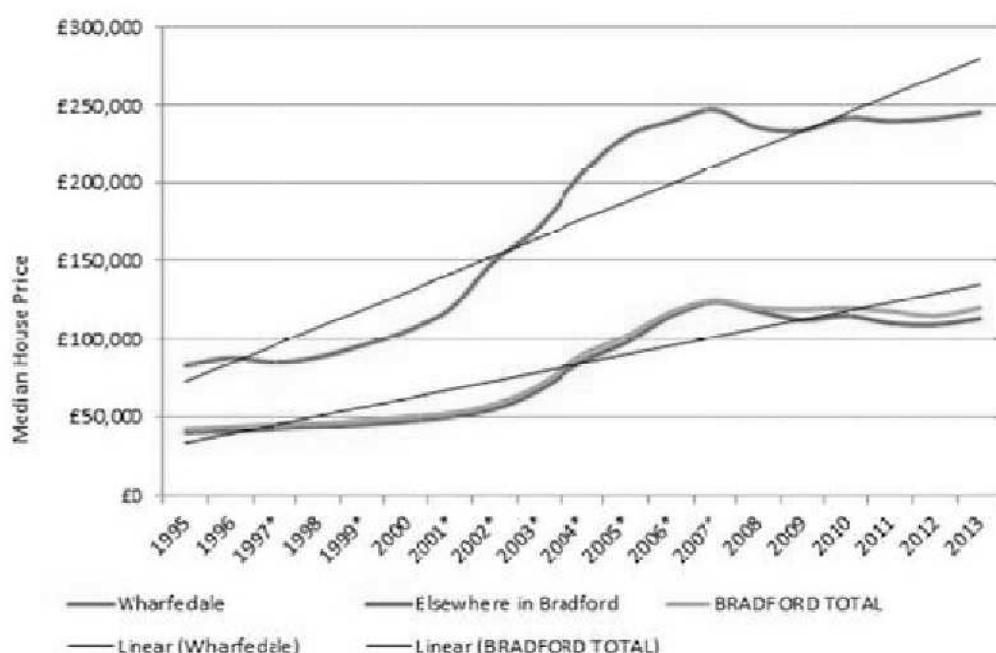
Source: HM Land Registry: Price Paid Data

3.8 In summary, the table shows that lower quartile prices in Wharfedale have risen by 297% between 1995 and 2013 in comparison to 267% in the rest of Bradford and that the average lower quartile price paid on a property in Wharfedale is £175,000 and £80,000 in the rest of Bradford. This is a difference of well over 100%.

3.9 For information, the average price paid on a property in 2013 in Wharfedale is £294,158 and in the rest of Bradford £125,799. Within Ilkley alone average house prices for the first quarter of 2014 have reached a figure of £330,000 which is well beyond the Bradford District average and the averages for the County of North Yorkshire

3.10 In relation to the median quartile, the figures show that house prices in Wharfedale have risen by 297% between 1995 and 2013 in comparison to 283% in Bradford and that the average median quartile price paid on a property in Wharfedale is £245,500 and £113,000 in the rest of Bradford. Again this is a difference of well over 100%.

Table 3.4 Median Quartile Housing 1995-2013



Source: HM Land Registry: Price Paid Data

3.11 NLP has also investigated the income needed to obtain a lower quartile property in Wharfedale and the rest of Bradford. In Wharfedale it is £50,000; in Bradford it is £22,857.

3.12 In conclusion, what this information shows is that properties in Wharfedale are over double the value of those in the rest of Bradford and that they are unaffordable for the majority of the population in Bradford in comparison to the rest of the City. Furthermore, in NLP's view, it indicates an "*imbalance between the demand for and supply of housing*" inferred in paragraph 19 of the PPG

and that this can only be lessened by increasing the supply of housing to meet demand in the Wharfedale area.

Rents

3.13 In relation to rental values, the SHMA sub-area portrait for Wharfedale 2010 states that, in relation to the 2008 housing market, the median private rent in 2008/9 for Wharfedale area was £650 in comparison to £495 for Bradford.

3.14 To illustrate the recent change in rental values, the below table shows that both the 2014 lower quartile and mean average rental values in Wharfedale are considerably higher than either in the city centre (BD1) or central Bradford area (Bradford South East).

Table 3.5 Rental Values per-calendar month

Rents	Wharfedale	Bradford BD1	Bradford South East
Lower Quartile	£610 pcm	£390pcm	£395pcm
Median	£991pcm	£466pcm	£478pcm

Source: Rightmove

3.15 What these facts show is that, whilst there has been a significant rise in rental prices in Wharfedale over the past six-year period, the rental value has dropped slightly in other areas (6% in Bradford BD1 and 3.5% in Bradford South East). Clearly therefore, this has made the affordability of renting in Wharfedale significantly more expensive in comparison to other parts of Bradford than previously. Furthermore, it is clear evidence that rents are rising faster in Wharfedale than the local average. Consequently, as inferred in paragraph 19 of the PPG, this indicates a "*particular market undersupply relative to demand*".

Rate of Development

3.16 While the Council have not recorded definitive information with regard to rates of development in Wharfedale post the year 2000 detailed local knowledge provided and on the ground observations clearly demonstrate a particularly low level of development in the Bradford sub area of Wharfedale. Prior to the year 2000 there were a number of development schemes in Ilkley in large gardens including both relative dense flatted developments and detached/terraced dwellings. Post 2000 garden developments decreased in number and capacity as the character of certain areas of the town began to change and post 2010/2011 national policy guidance resulted in a more restrictive approach to this type of development. There are no main outstanding allocations to develop but small windfall sites continue to come forward.

3.17 In Menston the two main sites at Bingley Rd and Derry Hill, with a combined capacity of 300 dwellings, were allocated in 2005. It has taken eight years for these sites to be granted outline and full planning permission respectively and

development is not expected to start for some 6 months while conditions are discharged. This delay has been almost entirely the result of community resistance to these proposals including for example a village green inquiry. The recent redevelopment of the working men's club site in the village has yielded circa 12 dwellings.

3.18 In Burley the two large developments to the south of the by-pass and at Scalebor Park were predominantly complete by 2000. Since then only very small developments have been completed or started including the Malt Shovel PH development of circa 20 units. The Moor Lane Centre redevelopment (the last phase of the Scalebor Hospital site) will commence shortly.

3.19 A number of these developments (especially the two allocations at Menston) will be provision for the backlog of need/demand identified during previous years. Moreover, information contained in Policy HO3 and WD1 of the BLPCS shows that the following numbers are proposed in the four areas of Wharfedale over the plan period.

Addingham	- 200 (Local Service Centre)
Burley In Wharfedale	- 200 (Local Service Centre)
Ilkley	- 800 (Principal Town)
Menston	- 400 (Local Service Centre)

3.20 Overall, the BLPCS proposes that Wharfedale will contribute just 1600 of the 42,100 total housing numbers proposed over the plan period or 3.9% of the total. Setting aside the need to address the market signals identified in this report, this is well below the proportion of housing which would be allocated to Wharfedale if they were distributed on a pro-rata basis based solely on population.

3.21 Furthermore, the SHLAA update May 2013 suggests the following numbers potentially "suitable now" (1-5 years) in Addingham, Burley In Wharfedale, Ilkley and Menston:

Table 3.6 Numbers of site / units - "Suitable Now"

Area	Number of Sites "Suitable Now"	Number of Dwellings
Addingham	0	0
Burley In Wharfedale ²	0	0
Ilkley	14	264
Menston	7	400.4

Source: SHLAA - May 2013 Update

² It is noted that the SHLAA does not take account of the recent permission secured by Bellway Homes for 37 dwellings on the former Moor Lane Centre, Burley in Wharfedale.

3.22 In these circumstances, it is clear that, at least in the short term, little new housing is likely to come forward in the area in the next 5 years to meet any housing needs the area has. As stated above any development that does occur in the short term will primarily be addressing the backlog of unmet needs from recent years, rather than addressing future needs.

Overcrowding / Under Occupation

3.23 The overcrowding rates in figures in Wharfedale contained in the 2013 sub-area profile show an overcrowding rate of just over 2% in comparison to nearly 5% in Bradford generally.

3.24 Equally, the vacancy rate is 3.9% (in comparison to the Bradford average of 6%) and long term empty properties are just 2.5% (in comparison to the Bradford average of 3.8%).

3.25 In view of these facts, there is not considered to be any evidence to claim that there is an unacceptable level of overcrowding or vacancy occurring in the Wharfedale area.

3.26 However, a review of the 2011 census shows that for Wharfedale 84.4% of households were under-occupying their house, a figure that is far higher than the District (65%) and national (68%) average rates. This would therefore appear to show that elements of the population are unable to "downsize". This is because of a lack of alternative smaller housing in the area. Residents are therefore faced with the dilemma of either remaining in a house that is too large for them or moving out of the area to downsize because of the lack of supply of smaller housing in Wharfedale. Additionally, they are 'blocking' people moving into larger accommodation, thereby creating a lack of supply issue for those seeking larger accommodation.

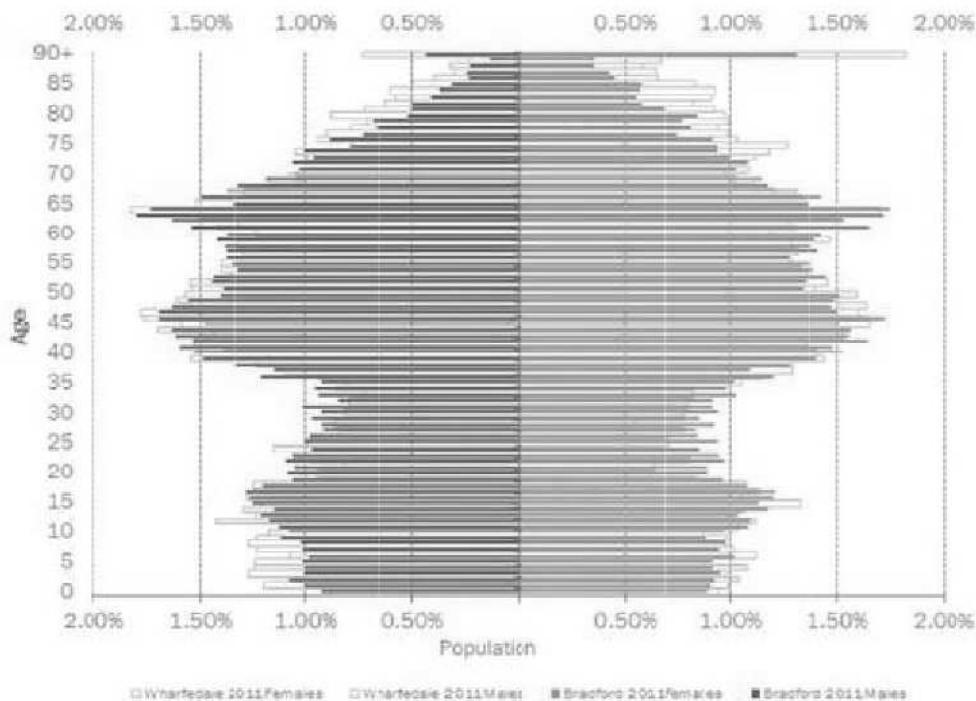
Analysis of other data sources

Population Demographics

3.27 The age demographic chart shown below shows graphically the make-up of the age make-up of the population of Bradford with the population of Wharfedale added onto it. The key points the chart below reveals are:

- Wharfedale has a substantially aging population, particularly females;
- There is a significant lack of people in Wharfedale in the 20-36 year old age bracket.

Table 3.7 Bradford Population



Source: Census 2011

3.28 Overall, these figures show that the population age range normally associated with starting households and raising families (20-36) are absent in Wharfedale - almost certainly in part because of the lack of and unaffordability of housing to meet their needs. NLP hold that the absence of this sector of the population, plus the significant number of elderly people in the area, does not create a mixed, balanced and sustainable community. Indeed, there are signs that it is becoming increasingly unbalanced. Furthermore, if this is allowed to continue, there will be will not be a "*supply of housing required to meet the needs of present and future generations*³", in all sectors of the population, to the detriment of the make-up of the area.

Viability

3.29 In relation to viability, the Council has produced a document entitled the "Bradford District Local Plan Core Strategy – Viability Assessment" (September 2013) as a result of the need for viability testing of the Local Plan to meet the requirements of the NPPF.

3.30 In relation to Wharfedale, it shows that it is the only area in Bradford that:

- Can generate site values of £3.26m per ha (£1.32m per acre), while at the other end of the spectrum Inner Bradford and Keighley produce negative land values (Paragraph 4.5.1)
- "*Reaching Level 6 of the Code for Sustainable Homes is indicated to be unviable in all areas other than the higher value area of Wharfedale at current values*". (Paragraph 4.7.3)

³ Paragraph 7 NPPF.

- Wharfedale can support the highest percentage of affordable housing in the Borough (the report at paragraph 4.13.1 considers it can support 40%. The emerging policy – HO11 - suggests up to 30% can be delivered in Wharfedale. In both cases, this is a higher level of affordable housing being sought than elsewhere in the Borough).

3.31 In addition to the information contained in the viability assessment, information provided from local agents active in the area suggest that recent land sale transactions have achieved circa £1m net per acre. When grossed back to a comparable greenfield site value, this has resulted in figures close to £2m/acre.

3.32 In these circumstances, it is clear that Wharfedale is clearly a viable area to build houses in and is therefore, at least in these terms, attractive to developers to deliver both market and affordable homes.

SHMA Update 2010 and 2013

3.33 The SHMA sub area portraits, attached as Appendix 1 and Appendix 2, demonstrate a number of notable trends of relevance to this analysis. For ease of reference, we have tabulated them below.

Table 3.8 Rising over 60+ Population

	2010	2013
	Wharfedale / Bradford	Wharfedale / Bradford
Population Age Groups – Over 60's	23% / 18%	30% / 19%

Source: Bradford SHMA 2010 and Update 2013

3.34 What the above shows is that, whilst the over-60 population in Bradford has grown slightly in the last three years, the elderly population in Wharfedale has grown by 7% according to the Council's own sub-area profile. For comparison purposes, the figure for over-60's in England is 22.7% (Source: 2011 Census) – 7.3% lower than in Wharfedale.

3.35 What this amplifies is that Wharfedale has an above average over 60+ population.

Tenure

3.36 In relation to tenure, the below shows that in the last three years there has been a marked decline in owner occupied properties in Wharfedale (down 7%) and subsequent rise in private rented properties (whilst rented affordable housing has remained broadly similar).

3.37 This would appear to indicate that the current affordability issues may be, at least in part, reducing the number of people getting on the property ladder, with more people choosing to rent in the private market instead.

Table 3.9 Tenure Mix

Tenure %	2010 - Wharfedale / Bradford	2013 - Wharfedale / Bradford
Owner Occupied	87% / 70%	80% / 65%
Private Rented	8% / 14%	13% / 20%
Affordable	5% / 16%	6% / 15%

Source: Bradford SHMA 2010 and Update 2013

3.38 The above also shows that there are very low levels of affordable housing in Wharfedale in comparison to the rest of the Borough. As such, there is a clear lack of supply for those families and individuals with modest or average incomes who would like to settle in the Wharfedale area. The same is true of low cost market housing which makes it particularly difficult to access new entry level starter homes within these market conditions. Given the very limited availability of vacancies in the existing stock this makes it difficult for young households 25- 35 age range to access entry level housing.

Key Issues

3.39 The SHMA sub-area portrait usefully includes, amongst other things, a list of housing and demographic differences that are distinct to the districts overall area profile. It shows the following that is useful for considering the Wharfedale housing market:

The Wharfedale area has:

- Low levels of social and private rented stock.
- Low levels of Terraced Stock.
- Low levels of one bedroom stock.
- Low levels of persons aged 0-15.
- A low vacancy and overcrowding rate.
- High levels of owner occupied stock.
- High levels of 4 bedroom stock
- High levels of persons aged 60+.
- High under-occupancy rates.
- High house prices, Incomes.
- High private rent prices.

3.40 It also identifies in its key issues section amongst other things that Wharfedale:

- Is a high value area with the higher house prices and affordability ratios in the district;
- Has historically lower levels of housing delivery;
- Has high levels of under-occupancy;
- Has access to affordable housing issues for existing and newly forming households.
- Has a need to ensure delivery of affordable housing alongside market housing in the area.

3.41 NLP cannot disagree with these findings. Indeed, our findings on:

- Land Prices
- House Prices
- Affordability of Housing
- Rental Levels;
- Rates of Development;
- Overcrowding;
- Population Demographics;
- Elderly Population work; and,
- Tenure mix,

all support the position outlined in the SHMA area profile.

3.42 In view of this agreement about the issues the Wharfedale housing market faces and the market signals it is sending out, it is clear that both the Council and NLP have similar concerns about imbalances in the Wharfedale market. In these circumstances, it needs to be considered what, if anything, needs to be done to improve these imbalances whilst still meeting the tests of sustainable development outlined in paragraph 7 of the Framework and particularly:

“...ensuring that sufficient land of the right type is available in the right places and at the right time to support growth”

“.... supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations”

3.43 This question is considered in the last section of this report

4.0

Conclusions

Policy Background

4.1

The Council's policy HO3 seeks to indicate how the proposed housing requirement will be split between different planning areas and ultimately how many homes each of the settlements in the district will be allocated.

4.2

In summary, having:

- Determined the general principles underlining the distribution of housing growth; and,
- Developed a "base line distribution" which could then be compared and reality checked against a range of criteria,

the district wide housing requirement of 42,100 was assigned according to the proportion of population within the each settlement.

4.3

The consequence of this process was that it resulted in:

- 263 dwellings being proposed on this basis in Addingham.
- 518 dwellings being proposed on this basis in Burley in Wharfedale.
- 1194 dwellings being proposed on this basis in Ilkley.
- 362 dwellings being proposed on this basis in Menston.

4.4

However, the Council then used "key factors and evidence" to adjust and finalise the housing distribution. Having done this, the Council reached the following conclusions in relation to Wharfedale.

Ilkley was considered as a principal town, with the Council settling on a figure of 800 or 1.9% of the district wide total. This figure was 394 dwellings below the 'proportionate' figure of 1194 proposed.

Addingham was considered as a local service centre, with the Council settling on a figure of 200 or 0.5% of the district wide total. This figure was 63 dwellings below the 'proportionate' figure of 263 proposed.

Burley in Wharfedale was considered as a local service centre, with the Council settling on a figure of 200 or 0.5% of the district wide total. This figure was 318 dwellings below the 'proportionate' figure of 518 proposed.

Menston was considered as a local service centre, with the Council settling on a figure of 400 or 1% of the district wide total. This figure was 38 dwellings more the 'proportionate' figure of 362 proposed.

4.5

These figures were subsequently translated into policies HO3 and WD1.

Conclusion

4.6 It was shown in the previous section that both the Council and NLP's evidence agrees that the key housing issues in the area are that it:

- Is a high value area with the higher house prices and affordability ratios in the district;
- Has historically lower levels of housing delivery;
- Has high levels of under-occupancy;
- Has access to affordable housing issues for existing and newly forming households.
- Has a need to ensure delivery of affordable housing alongside market housing in the area.

4.7 In summary, the approach that the Council is recommending in policy HO3 (and subsequently WD1) will not meet local housing need as outlined in their key issues for the area.

4.8 Specifically this is because:

1. Without building further houses in the area, and therefore increasing the supply of houses available, it is difficult to see how house prices will not continue to be significantly above those in the rest of Bradford. Moreover, the areas lack of affordability will continue to mean that those starting households (those between the ages of 20-36) will continue not to settle in Wharfedale and those houses available will continue to be beyond all but those earning the highest income levels, in turn creating an unsustainable community.
2. The relatively few housing numbers proposed will continue to mean that the low level of housing delivery will continue, thereby exacerbating the numerous current problems already showing in the current housing market.
3. Without any smaller houses to move to there will continue to be high levels of under-occupancy in the area since the only other alternative available to current residents will be to move out of the area.
4. With such a low level of housing build proposed, there will be little or no potential access to affordable housing for existing and newly formed households, thereby exacerbating current issues of unaffordability, lack of supply and an unsustainable demographic age distribution. This is all the more disappointing since the Council's own viability study clearly shows that the area is most able to support the development of affordable housing.
5. Both the SHMA profile and NLP agree that there is a need to ensure delivery of affordable housing alongside market housing in the area.

However, the lack of proposed housing numbers for the plan period is clearly contrary to this agreed strategy and will just exacerbate the issues identified by both parties including low levels of social and private rented stock; an unbalanced population demographic; high under-occupancy rates; high house prices, private rent prices and affordability issues.

4.9 As stated previously, the advice contained in paragraph 20 of the PPG clearly indicates that:

"A worsening trend in any of these (market signal) indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections"

4.10 It continues that:

"The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be".

4.11 In these circumstances, NLP does not consider that the proposed allocation in Wharfedale meets local housing needs and therefore must be contrary to both the Council's justification for the housing targets proposed for Local Service Centres and paragraph 7 of the Framework which seeks to ensure:

"...that sufficient land of the right type is available in the right places and at the right time to support growth"

"... supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations"

4.12 The PPG clearly indicates that an increase in housing supply is appropriate where market signal indicators show a market has affordability issues and indicators of high demand.

4.13 For these reasons NLP and the other professionals involved in this and parallel assessment exercises conclude that a very strong case exists for distributing higher housing numbers to the Wharfedale settlements. The current approach for the Wharfedale sub area as contained in draft policies HO3 and WD1 is unsound as it does not meet the objectively assessed housing needs of the area.

Appendix 1 Bradford SHMA 2010 - Wharfedale sub-area portrait

Wharfedale 2010

Craven, Ilkley, Wharfedale

Population 43,018

Households 18,585

Age Groups (%)	Wharfedale	Bradford
0 - 18	24	28
19 - 59	52	54
60+	23	18

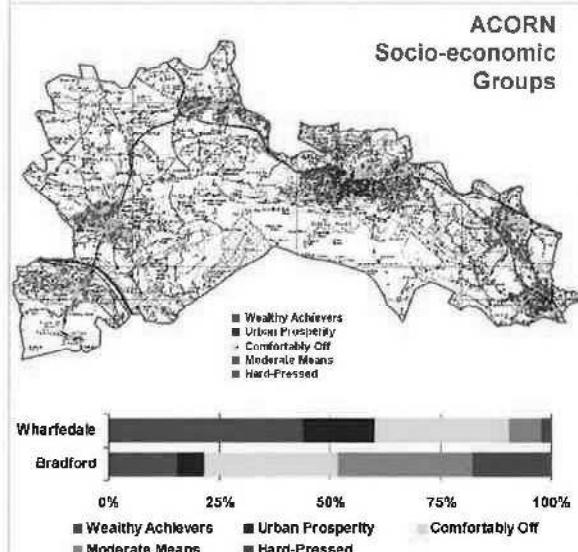
Ethnicity (%)	Wharfedale	Bradford
White British	98	78
Indian	0	2
Pakistani	0	11
Bangladeshi	0	1

Migration Origin (%)	Wharfedale	Bradford
Within District	64	77
Outside District	36	23

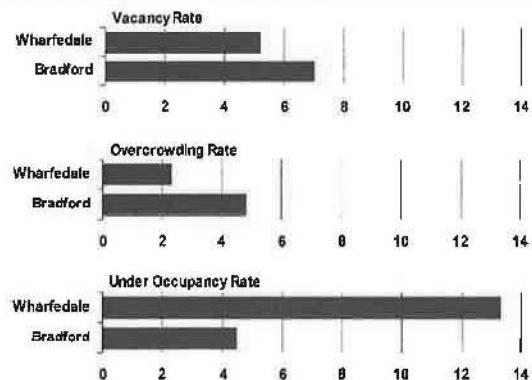
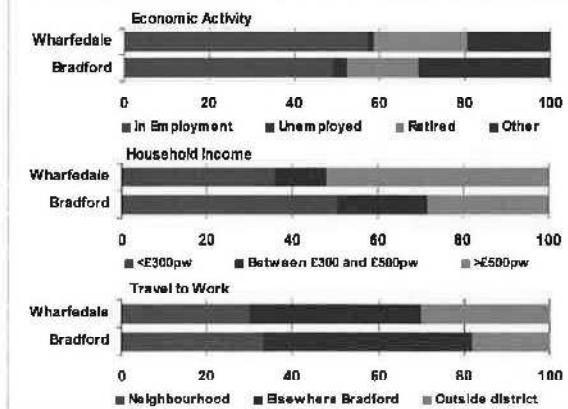
Tenure (%)	Wharfedale	Bradford
Owner Occupied	87	70
Social Rented	5	16
Private Rented	8	14

Property Type (%)	Wharfedale	Bradford
D/Semi-detached	57	44
Terraced	25	35
Bungalow	8	7
Flat	10	14

Bedrooms (%)	Wharfedale	Bradford
1-2 bedrooms	32	39
3-4 bedrooms	60	58
5+ bedrooms	9	4



Housing Market 2008	Wharfedale	Bradford
Median House Price	£204,000	£120,000
LQ House Price	£152,200	£90,000
Median Household Income	£29,400	£15,325
LQ Household Income	£11,700	£6,500
Affordability Ratio (ASHE, Land Registry)	9.8	5.8
Median Private Rent (2008/9)	£650	£495



Wharfedale

Affordable Housing Need				
239 households in current need (PA) 127 households in future need (PA)	Affordability Requirements: General 1 Bed -8 2 Bed 70 3 Bed 49 4 Bed 1 Older 1 Bed 10 2 Bed -2			
120 households in need – NET shortfall (Per annum)	Total	120 Households		
Equivalent to 16% of total annual affordable housing need in the district. Shortfall of affordable accommodation in most sizes. In particular 2 and 3 bedroom general needs accommodation.				
Housing and Demographic differences (compared to district profile)				
LOW levels:	HIGH levels:			
Social and private rented stock Terraced stock 1-2 bedroom stock Persons aged 0-18 BME population (virtually none) Within District Migration Unemployed persons Households earning less than £500pw Persons working within neighbourhood Vacancy rate, overcrowding rate - - Hard-pressed (ACORN)	Owner occupied stock Detached, semi-detached stock 3+ bedroom stock Persons aged 60+ White British Households Outside district migration Employed persons Households earning more than £500pw Persons working outside of neighbourhood Under occupancy rate House prices, Incomes Affordability ratios, private rents Wealthy achievers (ACORN)			
Population Change				
This sub-area had experienced a decrease in population over the period 2001-7 and there has been a noticeable outflow of residents aged 25-39. The number and proportion of older people (28.4%) is expected to increase and over the period 2001-7 the number of people aged 75 and over grew by 17%. There is in-migration particularly from Leeds, Craven and the North West Region which is helping to stem population loss and 80% of migrant heads of household are aged under 50, with some retirement migration into the sub-area.				
Key Issues				
<ul style="list-style-type: none"> High value area with the highest house prices and affordability ratios in the district. Strong links to Leeds in terms of travel to work and in migration to the area. Historically lower levels of housing delivery. High levels of under occupancy. Access to affordable housing is an issue for existing and newly forming households. Need to ensure delivery of affordable housing alongside market housing in the area. 				

Appendix 2 Bradford SHMA Update 2013 - Wharfedale sub-area portrait

Wharfedale 2013

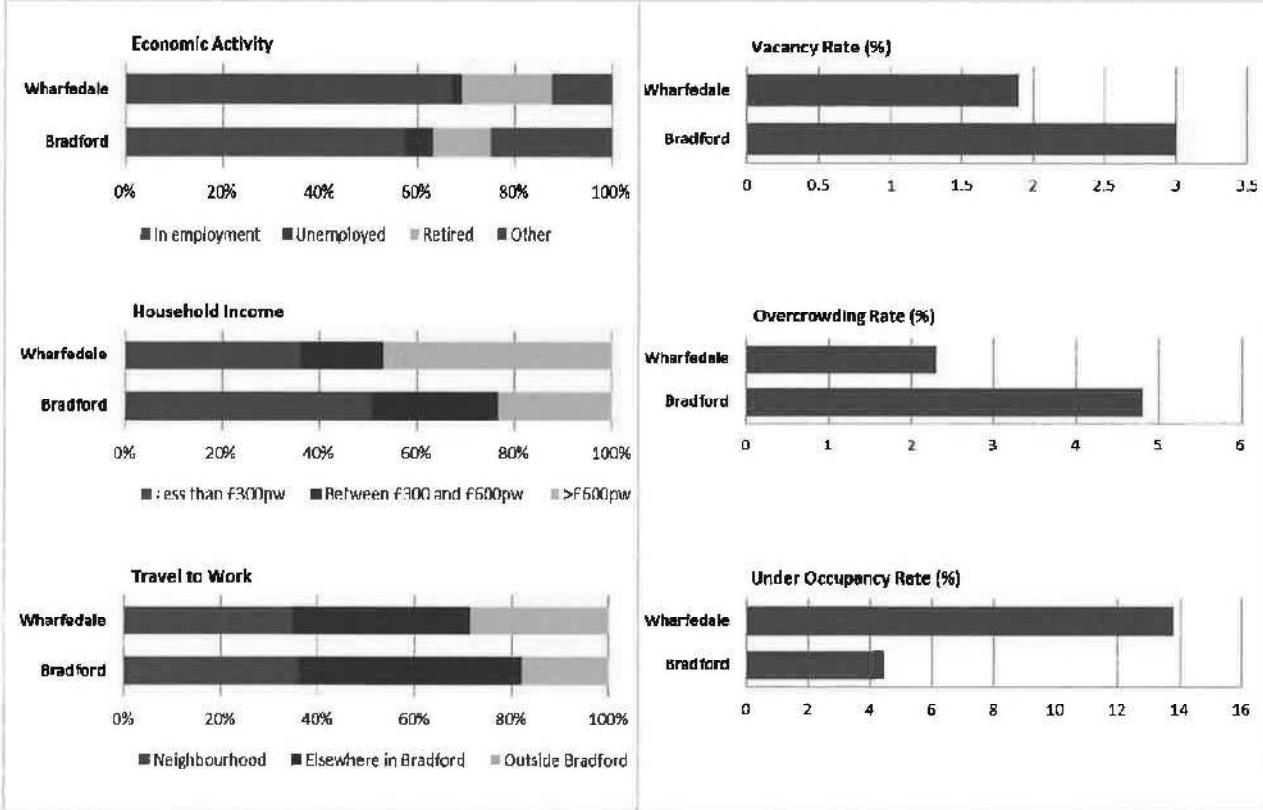
Craven, Ilkley, Wharfedale

Population 43,018

Households 18,538

Age Groups (%)	Wharfedale	Bradford	Tenure (%)	Wharfedale	Bradford
0-15	18	23	Owner occupied	80	65
16-39	23	34	Private Rented	13	20
40-59	29	25	Affordable (Social Rented/ Intermediate Tenure)	6	15
60-74	18	12			
75+	12	7			
Ethnicity (%)	Wharfedale	Bradford	Property Type (%)	Wharfedale	Bradford
White; English/Welsh/Scottish/ Northern Irish/British	95	64	Detached	22	10
White; Others	3	4	Semi-detached	23	29
Mixed/Multiple Ethnic	1	4	Terraced	28	38
Asian/Asian British; Pakistani	0	3	Bungalow	9	8
Asian/Asian British; Other	1	20	Flat	16	15
Black/Black British	0	6	Not Known	1	1
Other	0	2			
Migration Origin (%)	Wharfedale	Bradford	Bedrooms (%)	Wharfedale	Bradford
Within District	64	77	1 bedroom	7	11
Outside District	36	23	2 bedrooms	27	27
			3 bedrooms	46	52
			4 bedrooms	19	8
			Not known	1	1

Housing Market 2012	Wharfedale	Bradford
Median House Price	£210,000	£115,000
LQ House Price	£155,000	£80,000
Median Household Income	£29,400	£15,325
LQ Household Income	£11,700	£6,500
Median Private Rent 2012	£495	£475



Wharfedale

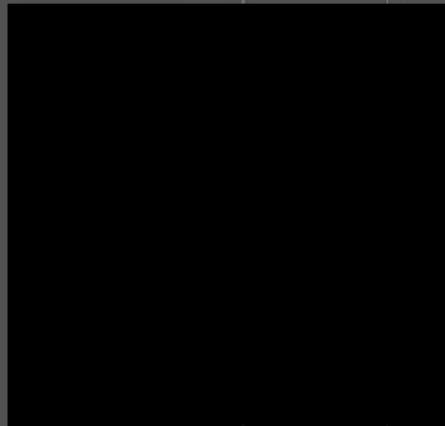
Affordable Housing Need								
21	Total backlog need (each year)	Affordability Requirements (households):						
29	Newly-arising need (each year)	General 1 Bed						
39	Affordable supply (each year)	2 Bed						
		3 Bed						
		4 Bed						
		Older 1 Bed						
		2 Bed						
11	NET shortfall (each year)	Total						
Housing and Demographic differences (compared to district profile)								
LOW levels:			HIGH levels:					
Social and private rented stock			Owner occupied stock					
Terraced stock			Detached stock					
1 bedroom stock			4 bedroom stock					
Persons aged 0-15			Persons aged 60+					
BME population			White British Households					
Within District Migration			Outside district migration					
Unemployed persons			Employed persons					
Households earning less than £600pw			Households earning more than £600pw					
Persons working within neighbourhood			Persons working outside of neighbourhood					
Vacancy rate, overcrowding rate			Under occupancy rate					
			House prices, Incomes					
			Private rent prices					
Population Change								
<p>This sub-area had experienced a decrease in population over the period 2001-7 and there has been a noticeable outflow of residents aged 25-39. The number and proportion of older people (28.4%) is expected to increase and over the period 2001-7 the number of people aged 75 and over grew by 17%. There is in-migration particularly from Leeds, Craven and the North West Region which is helping to stem population loss and 80% of migrant heads of household are aged under 50, with some retirement migration into the sub-area.</p>								
Key Issues								
<ul style="list-style-type: none"> • High value area with the highest house prices and affordability ratios in the district. • Strong links to Leeds in terms of travel to work and in migration to the area. • Historically lower levels of housing delivery. • High levels of under occupancy. • Access to affordable housing is an issue for existing and newly forming households. • Need to ensure delivery of affordable housing alongside market housing in the area. 								



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Appendix Two

REPRESENTATIONS TO THE BRADFORD CORE STRATEGY PUBLICATION DRAFT (February 2014)

On behalf of Barratt and David Wilson Homes, Miller Homes, Redrow Homes, Skipton Properties and Taylor Wimpey UK

Review of City of Bradford District Core Strategy Habitats Regulations Assessments

By

[REDACTED] Baker BSc (Hons) MIEEM

(legal review by [REDACTED] Simpson)

28 March 2014

Project data

Client	Bradford CS Consortium
Reference	Bradford Core Strategy
Report title	HRA Review
File reference	475_001_rep_final.doc
Team leader	[REDACTED] Baker
Contact details	[REDACTED]

Revision tracking

	Name	Position	Date
Author	[REDACTED] Baker	Managing Director	28 March 2014
Reviewed	[REDACTED] Simpson	Freeth Cartwright LLP	27 March 2014
Revised	[REDACTED] Baker	Managing Director	31 March 2014

Baker Consultants Ltd.

[REDACTED]
Matlock

[REDACTED] DE4 [REDACTED]

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Summary

1. The City of Bradford District Council has recently released the publication draft of its Core Strategy Development Plan Document (February 2014) ("Core Strategy PD") together with an associated Appropriate Assessment report ("AA 2014"). The Core Strategy PD is also accompanied by a further earlier AA report which is dated May 2013 (but 'back dated' to October 2011) ("AA 2013").
2. The AA 2013 and AA 2014 have been reviewed and have been found wanting, both scientifically and legally. Significant legal and scientific flaws have been identified in the methodology employed by the authors meaning that the AA 2013 and AA 2014 cannot be relied upon. As such proposed policies in the Core Strategy PD which have been informed by the AA 2013 and/or AA 2014 are also unreliable and cannot be justified. The key findings of the review are summarised below.
3. The Core Strategy Further Engagement Draft ("Core Strategy FED") (October 2011) refers to an appropriate assessment which had already been undertaken as at that date (see para 1.27). This assessment has not been published. Instead only the later AA 2013 and AA 2014 have been published. This 2011 appropriate assessment must be provided.
4. No evidence of the screening assessment of the Core Strategy, as is required in accordance with regulation 102 of the Conservation of Habitats and Species Regulations 2010 ("2010 Regulations"), has been published in support of the AA 2013, AA 2014 and the Core Strategy PD. There is reference in the AA 2013 and AA 2014 to a screening assessment by "Environ, 2012" but this has not been provided. This must be provided. The AA 2013 (para 9.1.1) also refers to a screening assessment dated "March 2010". This must also be provided.
5. The screening assessment referred to in AA 2013 and AA 2014, "Environ, 2012", is described as being a screening assessment of both the draft Core Strategy and the draft Waste Strategy together. This is not appropriate. There must be single screening report dealing with the Core Strategy as is required by regulation 102 of the 2010 Regulations.
6. Following well established principles under caselaw, the screening report must take into account the Core Strategy as a whole including any necessary avoidance/mitigation measures including any necessary safeguarding/qualifying policy wording. It would appear that this has not been the approach here. The assessment in this case (reflected in AA 2013 and AA 2014) has proceeded on the basis that the Core Strategy has failed the screening test in regulation 102 of the 2010 Regulations (although as noted above the screening assessment has not been provided) and that an appropriate assessment is therefore required. However it is in fact highly unlikely that an appropriate assessment is required since the correct approach to screening is to assess likely

impacts and then to take account any proposed avoidance/mitigation measures (including any necessary safeguarding /qualifying policy wording), as part of the screening process, to address those impacts. Indeed it is noted that the 2011 version of the Core Strategy commented at para 1.27 that "The Core Strategy has been subject to an initial Appropriate Assessment (AA) as required under European and Domestic regulations. The assessment concluded that there were unlikely to be any significant effects upon the South Pennine Moor SPA/Special Area of Conservation (SAC) sites. Sufficient safeguards are in place, in the form of over-arching policies to ensure that the Core Strategy would not have a significant effect on the integrity of these sites." The key wording here is "The assessment concluded that there were unlikely to be any significant effects upon the South Pennine Moor SPA/Special Area of Conservation (SAC) sites". This is the wording of the screening test under regulation 102 of the 2010 Regulations. It is clear therefore that in 2011, taking into account the safeguarding policies (as screening requires), the screening test was in fact met and no appropriate assessment was therefore required.

7. The assessment in AA 2013 and AA 2104 has erred in law by confounding the status of a mobile typical species of a qualifying Annex I natural habitat of a Special Area of Conservation ("SAC") with the status of a mobile qualifying feature of a European site. The AA 2013 and AA 2014 proceed on the basis that mobile typical species are to be regarded and treated in the same way as mobile qualifying features. This is incorrect. As such the AAs have erred by taking into account potential impacts on the habitats of typical species located outside the boundary of the SAC which contains the Annex I natural habitat type to which the typical species are stated to relate. In addition the basis for the typical species chosen by the authors for analysis in AA 2013 and AA 2014 is insufficiently supported and not accepted. As such the AAs have incorrectly extended the scope of the assessment beyond that envisaged or required by regulation 102 of the 2010 Regulations or by the Habitats Directive.
8. The avoidance/mitigation measures proposed in the Core Strategy PD (in particular proposed Policies SC8 and HO3) have not been informed by any suitable or adequate assessment of impacts in AA 2013 or AA 2014 and are instead justified on the basis of a deficient assessment:
 - 8.1 The AA 2013 acknowledges throughout the document in relation to a number of the impact pathways identified that its conclusions are uncertain and are based on either insufficient or no evidence relevant to the South and North Pennines. Even in relation to the impact pathways where this is not expressly acknowledged it is clear that this is the case. The AA 2013 (para 9.4.1) itself notes that data gaps including bird surveys, habitat surveys and visitor surveys needed to be filled. The AA 2013 also acknowledges that the recommendations it makes for avoiding or mitigating impacts are "interim recommendations" (see heading on page 93) and "preliminary ideas for avoiding adverse effects on the integrity of European sites" (para 9.3.1). Where the AA 2013 report discusses "Adjusting the rate, scale and spatial distribution of

development" (para 8.3) it concludes that (para 8.3.1) "We are concerned that the overall level of housing being proposed within Bradford district is such that adverse effects on the SAC/SPA may not be capable of being avoided or mitigated" and "reducing the scale of housing allocations, particularly for settlements wholly or substantially within 2.5km of the SAC/SPA, is therefore likely to be necessary to satisfy the requirements of the Habitats Regulations". AA 2013's recommendations are therefore, by its own admission, insufficiently evidenced and are merely preliminary.

8.2 Further data was then collected in 2013 and referred to in the revised AA 2014: visitor surveys, breeding bird surveys and surveys of moorland fringe habitats. One would therefore expect the AA 2014 to review fully the AA 2013 based on the 2013 data obtained so as to re-assess the likely impacts on the relevant European sites; to conclude whether a significant effect on the European sites would be likely; to identify the nature and scale of any avoidance/mitigation measures needed to address any such likely impacts; and finally to present this clearly in the AA 2014. One would then expect the Core Strategy PD to contain policies reflecting the avoidance/mitigation measures which are evidenced through that process as being needed to address, in appropriate nature and scale, the specific identified impacts.

8.3 However this, regrettably, has not been the approach. The AA 2014 does not, in the case of many of the impact pathways, draw any conclusion as to the likelihood of significant impacts (or indeed adverse effects) on the European sites. The AA 2014 explains (section 6.3) that the Core Strategy PD is based on the AA 2013's recommendations (which were, as already explained merely "preliminary ideas" or "interim recommendations" in the absence of sufficient evidence), whilst taking into account the data from 2013. The Core Strategy PD has therefore simply run with the recommendations in the AA 2013 (even though they were "preliminary ideas" only), apparently tweaking them a little to reflect the data collected in 2013. There has, therefore, been no process of stepping back to assess whether the "preliminary ideas" made in AA 2013 are in fact necessary or appropriate in the light of further information obtained; or indeed whether (in the light of that information) there might be another approach which would retain flexibility as to the provision of housing development at this stage of the development plan process but nevertheless secure the necessary protection of the European sites.

8.4 In this way an assessment, which has been acknowledged even by its authors to be deficient and unreliable (the AA 2013), has come to dictate the extremely restrictive housing policy now found in Policies SC8 and HO3 of the Core Strategy PD without any adequate justification or indeed consideration of other potential approaches. The scale and nature of the reduction in numbers of housing / redistribution of housing which the Core Strategy PD states is needed is not evidenced by the assessment undertaken.

8.5 In relation to other possible approaches, we note that, in relation to atmospheric pollution, the AA 2014 recommends more detailed testing and traffic modelling during the pre-allocations testing stage which will precede development of the Allocations DPD (para 5.5.12). A similar approach could be adopted by the Core Strategy PD in relation to housing numbers and distribution. Following a proper assessment which must address the deficiencies identified in this report, a policy could be written to identify further information and data that is needed to make a reliable assessment of impacts of housing numbers/distribution on the European sites and to require that information and data to be obtained and to dictate the approach in the Allocations DPD.

9. Despite the additional data collected in 2013, the data and information on which the AA 2013 and AA 2014 are based are in any event wholly insufficient to make an assessment of impacts of the Core Strategy on the relevant European sites in this case. The following data/information have not been considered at all:

- Likely change population and demographics arising as a consequence of the Core Strategy and how that might translate into increased visitor numbers;
- The ability of the moors to accommodate visitor pressure; and
- The nature of the potential impacts specific to upland moors.

10. As it stands the AA 2014 concludes that there is no certainty as to the absence of adverse effects on the integrity of the relevant European sites. As such the Core Strategy cannot lawfully be adopted without compliance with regulations 103 and 105 of the 2010 Regulations. No information as to how the requirements of regulations 103 and 105 could be met has been provided. It is highly unlikely that these requirements could be met in this case.

11. AA 2013 and AA 2014 have not incorporated any 'in combination' assessment which is a requirement of regulation 102.

12. As part of the review a reassessment of the proposed avoidance / mitigation measures to ensure protection of the European sites must be undertaken. Such measures must be demonstrated to be necessary, proportionate and effective to address the likely evidenced impacts identified. The review must present the various options in terms of policy wording which might be available for incorporation into the Core Strategy so as to ensure the necessary protection of the European sites. The policies set out in SC8 and HO3 are unduly restrictive and it is unlikely that the nature and scale of the restrictions imposed are required to allow the requirements of regulation 102 to be met. Consideration should be given to adoption of a policy which secures protection of the European sites through the imposition of requirements as regards further data collection, which is the approach adopted by the authors in relation to atmospheric pollution (para 5.5.12 A 2014). In accordance with the "soundness test" (para 182 National Planning Policy Framework) the Core Strategy should adopt

the most appropriate strategy when considered against the reasonable alternatives and deliver sustainable development consistent with national policy. Unduly restrictive policies, which go further than is necessary in the context of a core strategy which is a high level document to secure protection of the relevant European sites, will not meet the soundness test.

13. The Strategic Appraisal (SA) of the Core Strategy, which has been submitted alongside the Publication Draft, refers to the flawed HRA and therefore cannot be relied upon in this respect.

1 Introduction

Background

14. The City of Bradford District Council has recently released the publication draft of its Core Strategy Development Plan Document (February 2014) ("Core Strategy PD") together with an associated Appropriate Assessment report¹ ("AA 2014"). The Core Strategy PD is also accompanied by a further earlier AA report which is dated May 2013 but is curiously 'back dated' to October 2011² ("AA 2013").
15. Following the publication of the Core Strategy PD and the AA 2013 and AA 2014 Baker Consultants Ltd and Freeth Cartwright LLP were approached by a consortium of interested parties (Commercial Estates Group, Persimmon Homes, Barratt Homes & David Wilson Homes, Redrow Homes Ltd) to provide a review of the two AAs and to assess the efficacy of the methods employed and whether or not the conclusions reached are justified, proportionate, necessary and consistent with the relevant legal framework.
16. This review has been principally the work of Baker Consultant's managing director Andrew Baker and Penny Simpson of Freeth Cartwright LLP.
17. Andrew has considerable expertise in nature conservation law and has published widely on the subject including (along with Brown Jacobson Solicitors) the 2nd Edition of 'A Manual of Nature Conservation Law' edited by Michael Fry. Through his involvement in Nature Conservation Working Group of the UK Environmental Law Association (UKELA) Andrew has been actively involved in the development of Nature Conservation Law and planning policy that affects ecological issues. Andrew has considerable expertise of the practical application of this area of law and teaches on European and domestic nature conservation law and its associated guidance and policy. He has had close involvement in a number of cases in particular ones that involve the protection of lowland heaths such as a Thames Basin Heaths and Dorset Heaths. In his earlier career as a field botanist Andrew worked for the Peak District National Park Authority and English Nature on upland heaths including the South Pennine Moors and he is therefore very familiar with these habitats and the pressures facing them.
18. Penny Simpson is an environmental lawyer and a partner at Freeth Cartwright LLP. She has over 14 years of experience in advising on nature conservation law, principally relating to the Habitats and

¹ Habitats Regulations Assessment for the City of Bradford District Core Strategy. Appropriate Assessment Report for the Publication Draft Document (February 2014) February 2014.

² Habitats Regulations Assessment for the City of Bradford District Core Strategy. Appropriate Assessment Report for the Further Engagement Draft Document (October 2011) May 2013.

Birds Directives. In her practice at Freeth Cartwright LLP she advises a wide range of public and private sector clients on these issues. She has very recently stepped down as chairperson of the Nature Conservation Working Group of the UKELA, having held that position for approximately 5 years. As well as her provision of day to day legal services to her clients on natural environment issues she is retained by many organisations to provide professional training on the Habitats and Birds Directives to environmental professionals. She has published widely on these issues including in the Journal of Planning and Environmental Law and has also been quoted by the Sunday Times newspaper for her Habitats and Birds Directive expertise.

19. The following report contains a critique of the two AAs that have accompanied the iterations of the Core Strategy to date. Much of the work is concentrated on the AA 2014 of the Core Strategy PD however the AA 2013 has also been reviewed as the AA 2014 references the AA 2013.

The Habitat Regulations Assessments of Development Plan Documents

20. Habitat Regulation Assessments ("HRAs"), as required under Article 6(3)-(4) of the Habitats Directive (92/43/EEC), must be undertaken in relation to both "plans" and "projects". In relation to "land use plans" the provisions of Article 6(3)-(4) Habitats Directive have been implemented in England by regulations 102, 103 and 105 of the Conservation of Habitats and Species Regulations 2010 ("**2010 Regulations**"). The Bradford Core Strategy is a land use plan and "it is the most important development plan document contained within the Local Plan. This is because it sets the strategy and framework within which all subsequent development plan documents are formulated" (para 1.5 of the Core Strategy PD). The purpose of a HRA of a core strategy is therefore to ensure that a later plan or project brought into effect under the core strategy, which is likely to have a significant effect on a European site (i.e. which fails the HRA screening test) and which will or may have an adverse effect on the integrity of a European site, as understood at the Core Strategy stage, cannot in the future be approved consistently with the core strategy.
21. The degree of detail available at the core strategy stage, when no more detailed plan or project has as yet come forward, will inevitably be limited. Therefore the appropriate manner in which to conduct an HRA of a core strategy is (i) to provide an assessment to the extent possible (bearing in mind the high level nature of the core strategy) of the impact of the plan on the qualifying features of the relevant European sites based on appropriate and relevant data and information; (ii) where necessary identify appropriate and proportionate avoidance and / or mitigation measures which reflect and address in nature and scale the negative impacts from the core strategy on the European sites which have been identified as being problematic; and (iii) providing qualifying policy wording within the core strategy to reflect those necessary avoidance / mitigation measures. The qualifying policy wording will thereby prevent a future plan or project proposal going forward unless there is

certainty as regards an absence of negative effects on the relevant European sites. In this way a core strategy represents a conditional, not irrevocable, commitment to future proposals.

22. The 2010 Regulations adopt a staged approach to HRA as is required under Article 6(3)-(4) of the Habitats Directive. This is set out, in relation to land use plans, in regulation 102, 103 and 105 of the 2010 Regulations.

102. Assessment of implications for European sites and European offshore marine sites

(1) *Where a land use plan –*

(a) *is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*

(b) *is not directly connected with or necessary to the management of the site,*

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

.....

(4) *In the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional strategy, the Secretary of State must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).*

103. Considerations of overriding public interest

(1) *If the plan-making authority are satisfied that, there being no alternative solutions, the land use plan must be given effect for imperative reasons of overriding public interest (which, subject to paragraph (3), may be of a social or economic nature), they may give effect to the land use plan notwithstanding a negative assessment of the implications for the European site or the European offshore marine site (as the case may be).*

105. Compensatory measures

Where in accordance with regulation 103 (considerations of overriding public interest) a land use plan is given effect notwithstanding a negative assessment of the implications for a European site or a European offshore marine site, the appropriate authority must secure that any necessary compensatory measures are taken to ensure that the overall coherence of Natura 2000 is protected.

23. It can be seen that the first stage is the test to be applied by the plan making authority to decide whether an appropriate assessment is required. This is known as the "screening" or the "likely significant effect" test. If the plan making authority concludes that the land use plan is not likely to

have a significant effect on the relevant European site alone or in combination with other plans or projects, the HRA is complete and the plan may be given effect.

24. It is important to recognise that the land use plan as a whole, including any necessary avoidance and / or mitigation measures envisaged within it (ie measures to avoid impacts on the relevant European site), must be the subject of the "screening test" in accordance with the judgment handed down in *Hart District Council v The Secretary of State for Communities and Local Government* [2008] EWHC 1204 (Admin).
25. Therefore where a screening assessment of a land use plan indicates that there are any aspects of the plan which would be likely to have a significant effect on a European site either alone or in combination with other plans or projects, the screening process should proceed iteratively to consider the incorporation of avoidance / mitigation measures tailored to address the offending impacts. This should include any qualifying policy wording, as referred to in paragraph 20 above. The land use plan should then be re-screened by the plan-making authority and a conclusion reached as to whether, taking into account the tailored avoidance / mitigation measures including policy wording, the land use plan is likely to have a significant effect on the relevant European site, alone or in combination with other plans or projects. This re-screening process may occur a number of times.
26. If a land use plan fails the screening test then an 'appropriate assessment' must be made by the plan making authority, following which regulation 102 requires the plan making authority to ascertain whether or not there will be no adverse effect on the integrity of the relevant European site. If the plan making authority ascertains, following its appropriate assessment, that the plan will not adversely affect the relevant European site then the plan may be given effect. If it does not so conclude then the provisions of regulations 103 and 105 apply. Only if the requirements of regulations 103 and 105 are met could the plan then lawfully be given effect.

2 Review of HRA

27. Bradford City Council has produced two AAs of its draft Core Strategy as set out above. These two documents are very similar however the AA 2014 has been modified to reflect a number of surveys that were carried out following the publication of the AA 2013. As such this review concentrates on the AA 2014. The AA 2013 document however sets out a number of recommendations have been referred to in the 2014 AA and therefore it is necessary to review these recommendations.
28. The Core Strategy Further Engagement Draft ("Core Strategy FED") (October 2011) refers to an appropriate assessment which had already been undertaken as at that date (see para 1.27). This assessment has not been published. Instead only the later AA 2013 and AA 2014 have been published. This 2011 appropriate assessment must be provided.

Appropriate Assessment May 2013 (October 2011)

29. The AA 2013 appears to have followed a previous joint screening assessment of the draft Core Strategy and draft Waste Management Plan (Environ 2012) as referred to in paragraph E1.3 of AA 2013. This document however cannot be found on the Council's website and therefore appears to be no public record of the screening assessment. The failure to publish the screening assessment is a concern and it must be provided. The AA 2013 (para 9.1.1) also refers to a screening assessment dated "March 2010". This must also be provided if different to the Environ 2012 screening assessment.
30. As noted in the paragraph 23 above, caselaw has shown that the plan making authority is required, when screening, to take the entire plan into account including avoidance or mitigation measures. Given this, it is at present far from clear as to why the Core Strategy PD has been determined to have failed the screening test. In addition the screening test must be applied in relation to each land use plan and it is not acceptable that the screening assessment referred to appears to have dealt with two plans together.
31. The majority of the AA 2013 is reproduced in the later AA 2014 and therefore is not reviewed in detail here.
32. However it is important to note that the AA 2013 acknowledges throughout the document in relation to a number of the impact pathways identified that its conclusions are uncertain and are based on either insufficient or no evidence relevant to the South and North Pennines. Even in relation to the impact pathways where this is not expressly acknowledged it is clear that this is the case. The AA 2013 (para 9.4.1) itself notes that data gaps including bird surveys, habitat surveys and visitor surveys needed to be filled.

33. The AA 2013 also acknowledges that the recommendations it makes for avoiding / mitigating impacts (eg reductions of housing allocation within 2.5km of the relevant Special Areas of Conservation (SACs) / Special Protection Areas (SPAs) and other related measures) are merely "interim recommendations" (see heading on page 93) and "preliminary ideas for avoiding adverse effects on the integrity of European sites" (para 9.3.1). Where the AA 2013 report discusses "Adjusting the rate, scale and spatial distribution of development" (para 8.3) it concludes that (para 8.3.1) "We are concerned that the overall level of housing being proposed within Bradford district is such that adverse effects on the SAC/SPA may not be capable of being avoided or mitigated" and "reducing the scale of housing allocations, particularly for settlements wholly or substantially within 2.5km of the SAC/SPA, is therefore likely to be necessary to satisfy the requirements of the Habitats Regulations".
34. AA 2013's recommendations are therefore, by its own admission, insufficiently evidenced and are merely preliminary. It is also unclear whether these recommendations are those of the competent authority or merely the views of the consultants who produced the AA.
35. This will be reviewed in more detail later in this document.

Appropriate Assessment of February 2014

36. The AA 2013 was updated by the AA 2014. The AA 2014, while very similar to the former document, is informed by 3 additional pieces of work.
 - Surveys of visitor activity within the SACs/SPAs;
 - Breeding bird surveys within 2.5km of the SACs/SPAs; and
 - Survey of moorland fringe habitats.
37. The AA 2014 however (rather than carrying out a full review of the potential impacts on the relevant European sites based upon the further data collected; providing a view as to likely impacts in view of that information; and recommending appropriate (proportionate and necessary) avoidance / mitigation measures to address those specific likely impacts) simply takes as read new Policy SC8 and HO3 and in that way carries over the "interim" / "preliminary idea" recommendations of AA 2013 without question.
38. In this way an assessment, which has been acknowledged even by its authors to be deficient due to inadequate data (the AA 2013), has come to dictate the extremely restrictive housing policy now found in Policy SC8 and HO3 of the Core Strategy PD without any adequate justification or indeed consideration of other potential approaches.

39. This flawed approach is explored in more detail below.

Methodology

40. The failure to publish the screening assessment associated with the AA 2014 is (as explained above) a continuing failure in this HRA process.

41. Section 2.1 AA 2014 sets out the guidance that has been followed in compiling the AA 2014 (this guidance was also referred to in AA 2013 (section 2.1)).

42. Paragraph 2.1.2 includes an excerpt from the EC (2000a) guidance on the use of the Precautionary Principle. It is important to note that the guidance recommends that the Precautionary Principle be triggered where “a preliminary scientific evaluation shows that there are reasonable grounds for concern that an activity might lead to damaging effects”. The EC guidance 2000a provides further guidance on what a *preliminary scientific evaluation* should include.

The implementation of an approach based on the precautionary principle should start with a scientific evaluation, as complete as possible, and where possible, identifying at each stage the degree of scientific uncertainty.

43. In addition, in the case of *R (Boggis) and another v Natural England* [2009] EWCA Civ 1061, Sullivan J stated that for a risk to exist which may then lead to failure of the HRA screening test there must be “credible evidence” that there is a “real, rather than a hypothetical, risk”.

44. In this AA 2014 insufficient scientific evaluation, particularly in relation to the recreational and other direct impacts alleged to present a threat to the SACs and SPAs from nearby housing development has been carried out or provided to allow reliance on the precautionary principle or to satisfy the view of Sullivan J. Specifically insufficient scientific evaluation has been carried out or provided to evidence the scale and nature of the reduction in numbers of housing / redistribution of housing which the Core Strategy PD states is needed as a consequence of the HRA.

45. The method adopted in the AA 2014 is further flawed. The AA 2014 concludes (para 8.3.1) that it is not possible to demonstrate with certainty that the Core Strategy PD will not lead to adverse effects on the integrity of the relevant European sites. On this basis the Core Strategy PD may only be adopted / given effect if the requirements of regulations 103 and 105 of the 2010 Regulations are first met. The AA 2014 provides no comment on these requirements or how they might, if at all, be satisfied in this case. These requirements are difficult to meet and it is highly doubtful that they could ever be met in this case. Therefore on the basis of the AA 2014 one concludes that the Core Strategy PD, as assessed under the AA 2014, has very little prospect of lawfully being adopted.

46. Having acknowledged the absence of certainty over the Core Strategy PD's impact on the integrity of the relevant European sites, paragraph 8.3.1 then states that "the Core Strategy establishes a reasonable and pragmatic approach to reducing the risk of adverse effects (including by redistributing development and providing for alternative recreational sites) and mitigating residual impacts (through access and habitat management) to demonstrate that adverse effects are capable of being avoided and / or mitigated. Further work is needed during preparation of the Allocations DPD to ensure that.....". However further work on the Allocations DPD has no relevance if the AA 2014 is unable to conclude (as is the case) that the Core Strategy PD will have no adverse effect on the integrity of the relevant European sites.

Typical Species

47. The approach adopted by the AA 2013 and AA 2014 has erred in law in relation to assessing impacts on the SACs, specifically with regard to "typical species". This error is perpetuated by the Core Strategy PD which is based in part, and incorrectly, on the conclusions reached in the AA 2014 as regards typical species (see e.g. paras 3.115, 5.4.36 Core Strategy PD).

48. First, the list of typical species is effectively a random selection of species made by the authors of the AA 2014 (based on the references at para 3.7.2 of the AA 2014), which is not accepted.

49. Secondly, the AA 2014 considers, as relevant to the HRA, impacts on mobile "typical species" outside the boundary of the SACs. This is incorrect. This approach fails to recognise the important difference between a qualifying feature of a European site and the typical species of an Annex I natural habitat for which a SAC is designated. SACs are designated under Articles 3 and 4 of the Habitats Directive for one or more of the natural habitat types listed in Annex I and species of animal or plant listed in Annex II of the Habitats Directive. These are the qualifying features of the SAC. The focus of a HRA is on the European site's qualifying features. The authors of the AA 2013 and AA 2014 have erred in giving mobile "typical species" of an Annex I natural habitat the same status and treatment as a mobile qualifying species. The use by mobile qualifying features (eg a specific identified population of a qualifying bird species for which a SPA is classified; or a specific identified population of a qualifying animal species for which a SAC is designated) of habitat outside the relevant SPA or SAC is relevant to a HRA because those birds or animals themselves (and indeed a specific population of them) are the qualifying feature. By contrast the "typical species" of a SAC's natural habitat is not an identified specific population of a named species. They are instead an assortment of species which are directly associated with / functioning as part of the qualifying natural habitat within the boundary of the SAC. Typical species are therefore only relevant to a HRA to the extent that they function with the qualifying natural habitat within the SAC for which the SAC is designated. As such impacts on typical species are only relevant to a HRA if they are associated with impacts on the qualifying natural habitat for which the SAC is designated. An impact outside the SAC boundary on species which happen to be typical of the SAC's qualifying natural habitat

does not amount to an impact on the *structure or function of the qualifying natural habitat* within the SAC. This is clear from:

- 5.2.1 Article 6(3) Habitats Directive: Under Article 6(3) a HRA must be made "in view of" the conservation objectives of the European site. The conservation objectives set by Natural England ("NE") in the case of the South Pennines and North Pennines SACs are available on NE's website. Note that the key objective is: "With regard to the natural habitats and / or species for which the site has been designated (the Qualifying Features listed below):...." Avoid deterioration of the qualifying natural habitats and the habitats of the qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site [see below] is maintained and the site makes a full contribution to achieving favourable conservation status of each of the qualifying features". "Integrity of the site" is defined in OPDM Circular 06/2005: "The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and / or the levels of populations of the species for which it was classified". The five maintenance and restoration objectives included in NE's conservation objective document also all relate to the qualifying natural habitats and the qualifying species. For example the document includes objectives to maintain or restore the "populations of the qualifying species" and the "distribution of the qualifying species within the site". There is reference to "typical species" within the objective to maintain or restore "the structure and function (including typical species) of qualifying natural habitats". This is therefore an objective to maintain or restore the function of the natural habitats within the SAC boundary, of which the typical species are a part. The typical species are only relevant to the extent that they function with the qualifying natural habitat for which the SAC is designated. Impacts on typical species are only relevant to the extent that they are associated with impacts on the natural habitat of the SAC. In further support of this it is important to note that the conservation objective document does not require (as it does for qualifying species) maintenance or restoration of "populations of typical species" or of the "distribution of typical species within the site". The approach adopted by the authors incorrectly proceeds as if such requirements did exist.
- The quote provided from the European Commission's MN 2000 guidance in para 3.7.1 of the AA 2014 does not support the authors' approach. It shows that the structure and function of the natural habitat within the SAC is the key issue, of which the typical species form part. The typical species are not to be considered distinct from that natural habitat:

"Habitat deterioration occurs in a site when:

the area covered by the habitat in the site is reduced or

the specific structure or functions [ie of that habitat] necessary for the long term maintenance or the good conservation status of the typical species which are associated with the habitat are reduced in comparison to their initial status".

- The authors' approach is inconsistent with their own stated approach at para 3.1.2 AA 2014 "...Adverse effects may also occur via impacts to mobile species occurring outside of a designated site but which are qualifying features of the site" (Table 3.1 of the AA 2014 lists those qualifying features, which (correctly) do not include any typical species).

50. Even to the extent that NE's conservation objective documents do make typical species relevant to a HRA (i.e. as noted above, when the typical species is impacted in conjunction with impacts on the natural habitat within the SAC boundary) there is no identified population level (e.g. numbers of pairs or percentage of the UK population) of any specific typical species which must be maintained or restored (contrast the position with qualifying species – see eg para 3.2.3 – 3.2.4 and 3.3.2 - 3.3.3 of AA 2014). Therefore even if the authors were to limit, in the assessment, their consideration of typical species (as they should) to the impacts on those species through impacts on the natural habitat within the SAC boundary, an adverse impact or risk of an adverse impact measured through the typical species would be very difficult to judge.

51. The AA 2014, by assessing potential impacts on 'typical species' (which are not qualifying features) outside the SAC boundary, has incorrectly extended to scope of the assessment beyond that which is envisaged and required by the Habitats Directive. Consequently too great an emphasis has been given the value of habitat outside the boundary of the European sites (see below). As noted above it is however acknowledged that habitat used outside the South and North Pennine SPAs by mobile qualifying species of the SPAs are relevant to the HRA.

52. The illogicality of this approach is fully demonstrated in paragraph 7.4.1 of the AA 2014 which considers the impact of the Core Strategy PD upon the North Pennine Moors SAC. The paragraph includes the following text.

'Development that significantly impinges, either directly or indirectly, on in-bye fields used by typical species of the Annex 1 habitats of the SAC could have an adverse effect on the conservation status of these species, and hence the habitat for which the SAC has been selected.'

53. The author has constructed an argument that impacts manifest upon typical species (Twite and Curlew in this case) from outside the SAC will somehow affect the SAC habitat that supports them. This is clearly not the case as there is no mechanism by which this might occur. While the populations of these birds may be affected by changes to the SAC's qualifying habitat within the boundary of the SAC, the converse is not true.

Identification of Impact Pathways

54. Section 5 of the AA 2014 sets out to identify the pathways by which the Core Strategy PD may have an adverse impact upon the relevant European sites.

Loss of supporting habitat

55. A key part of the assessment relates to the potential loss of supporting habitat outside the European site boundaries that may result in adverse effects upon the qualifying bird species of the SPAs. However this assessment also considers bird species that are considered by the authors to be "typical" of the qualifying natural habitats of the SACs and, for the reasons given above, this is therefore not considered to be relevant.

56. Of the qualifying birds species of the SPAs, only Curlew were recorded on the Strategic Housing Land Availability Assessment (SHLAA) sites that were surveyed (Table 5.3 page 47 AA 2014). Curlew is a qualifying species only for the North Pennines Moors SPA (this species is not included in the South Pennines Moors SPA designation) and yet the AA 2014 concludes that there is no adverse effect upon the integrity of the North Pennines SPA (paragraph 7.6.13)

Recreational impacts

57. A considerable part of the AA 2014 focuses on the potential impact on the relevant European sites of recreational activities arising from various policies within the Core Strategy PD. It would appear that the majority of the assessment is based upon the author's experience and knowledge of southern lowland heaths such as Thames Basin Heaths and Dorset Heaths. Much of the assessment is based upon data gathered from these areas.

58. The lowland heaths of southern England are however not only very different habitats but are also subject to very different recreational pressures.

59. The difference in the scale between the lowland and upland European sites, for example, raises questions as to how relevant data, regarding the lowland heather sites, are to the uplands. The Thames Basin Heaths SPA is a dispersed, archipelago European site of just over 8,200 Ha whereas the North Pennine Moors is over 147,000 Ha (see Table 1 below) i.e. more than 18 times the size.

60. Lowland heaths are subject to very different recreational pressures as the nature of the habitat has allowed visitors to create new path across the site over the dry sandy soils. The northern upland moors are mainly based on peat deposits that are wet and not easily negotiated away from paths.

Recreational pressure in the upland moors is therefore generally confined to well used paths that are maintained. The density of paths through the moors is also much lower on the northern upland heaths than lowland heaths.

61. These factors mean that the level of visitor penetration into the South Pennine and North Pennine European sites is likely to be very small compared to its total area.
62. As stated in paragraph 5.7.3 of the AA 2014 there is no evidence that the current level of recreation is having a negative impact upon the European sites and therefore no evidence of an effect that would warrant the use of the Precautionary Principle or satisfy the view of Sullivan J as above.

Table 1 Comparative areas of heathland sites.

European site	Area Ha
Thames Basin Heaths SPA	8,274.72
Dorset Heathlands SPA	8,168.79
Dorset Heaths SAC	5,730.73
North Pennine Moors SPA	147,248.41
North Pennine Moors SAC	103,109.42
South Pennine Moors SPA	66,207.01
South Pennine Moors SAC	64,983.13

Source JNCC

63. Data that has been gathered on the upland moors quoted in the AA 2014 e.g. Finney et al 2005 (para 5.7.17) refers to data collected from the Pennine Way which is one of the busiest routes on the Moors. While the data showed a disturbance effect in 400m strip either side of the path it does not demonstrate and overall impact on reproductive performance of Golden Plover. There is no assessment in the AA 2014 of how these disturbance effects may result in an adverse effect upon the integrity of the SPA i.e. would the population of birds, across the entire site, be limited by such recreational pressure. It is highly unlikely, given the scale of the upland moors, that such localised effects would result in an impact at the population scale.

Effects of dogs, Trampling and Erosion, Urban edge effects, Fires, Cat predation, and Urbanised Avifauna

64. All of the above impact pathways are cited in the AA 2014 however nowhere in the document is there any assessment of whether these impacts have an adverse effect upon integrity of the European sites. As with the previous sections much of the research cited is from studies of lowland heaths and therefore not comparable. Many of the statements are unsupported by any scientific evidence or reference to published literature. No attempt is made to assess how the proposed SHLAA sites will affect the overall population levels in the area and what level of additional pressure they will generate.

Avoiding Impacts and or Mitigating Impact

65. The Core Strategy PD imposes a redistribution of, and reduction in, housing development on the basis of a need identified in the AA 2014 (see HO3 and paras 5.3.53, 5.3.59, 5.3.62, 5.3.63, of the Core Strategy PD). The redistribution / reduction is also summarised in Table 1.1 of the AA 2014. The Core Strategy PD also incorporates Policy SC8 "Protecting South Pennine Moors and their zone of influence".
66. The need for housing redistribution / reduction appears to be based on an assumption that it (together with alternative recreational sites and mitigation of residual impacts (see E5.1 of AA2014)) is necessary to safeguard the European sites. But this is not adequately evidenced or justified in the AA 2014. For example, nowhere in the AA is there any consideration of how the new housing relates to projected population change in the area.
67. The logic presented as between the AA 2013 / AA 2014 and the Core Strategy PD is entirely circular. The AA 2013 suggests as a "preliminary idea" (based on the authors' acknowledged absence of sufficient data) the need to reduce / redistribute development (para 8.3.1 to 8.3.5). These "preliminary idea" recommendations were made before the survey data was available. The AA 2014 is then based on the Core Strategy PD reductions / redistributions in policies HO3 and SC8 but the Core Strategy PD is expressed to be based on the AA 2014! . So nowhere in the AA 2014 or elsewhere is there an explanation or justification presented of the extent and nature of the reduction / redistribution imposed by the Core Strategy PD in policies HO3 or SC8.
68. Rather than referring back to the "preliminary idea" of requiring a reduction / redistribution of housing as presented in the AA 2013, the AA 2014 should have made a re-assessment of impacts upon the relevant European sites in the light of the further evidence (and indeed other evidence which to date is missing from the analysis), concluded whether significant effects on the European sites were likely, then reassessed in the AA 2014 the need for the avoidance and / or mitigation measures previously assumed to have been necessary, and presented proportionate avoidance / mitigation measures necessary to address the specific likely impacts identified. The Core Strategy should then have reflected this analysis.
69. The highly restrictive (for housing) avoidance / mitigation measures presented in the AA 2014 (ie Policy SC8 together with the reduction in housing numbers / redistribution of housing in HO3) are not adequately justified by evidence presented in the AA. There is no evidence that they are proportionate or necessary. For example the restriction of housing numbers within 2.5km of the SPA is not based on any evidence of a demonstrable affect upon the European sites' integrity. In paragraph 6.3.3 AA 2014 it is stated that "Within 2.5km zone new development must avoid direct or indirect impact on supporting habitats". As discussed above the SHLAA sites support only 1 species

for which one of the SPAs (the North Pennine SPA) were designated (Curlew) and the AA 2014 concludes that there is no adverse effect upon the integrity of the North Pennine SPA. The scientific evidence does not justify the proposed restriction.

Sustainability Appraisal

70. The Bradford Core Strategy Publication Draft has been the subject of a Sustainability Appraisal (SA) which incorporates the requirements of a Strategic Environmental Assessment Directive 2001/42/EC. The SA report³ relies on the flawed HRA and reproduces the errors that have been highlighted above. The SA report cannot therefore be relied upon in respect to the assessment of impacts upon the European sites.

³ Sustainability Appraisal of the Bradford Core Strategy Publication Draft. Sustainability Appraisal Report. AMEC February 2014

3 Approach Going Forward

71. For the reasons set out above the AA 2013 produced for the Core Strategy FED and the AA 2014 produced for the Core Strategy PD are flawed both from a legal/procedural point of view and scientifically. As such the severe restrictions imposed on housing in the Core Strategy PD (in Policy SC8 and through HO3) are also unjustified.
72. As set out above the approach adopted by the authors of the AA 2014 and 2013, rather than being an objective assessment of scientific evidence, relies too heavily on assumed risks which are not evidenced in relation to the circumstances of these European sites in these areas.
73. The assessment undertaken to date must be reviewed, addressing all the deficiencies highlighted in this report above.
74. As part of the review a reassessment of the proposed avoidance / mitigation measures to ensure protection of the European sites must be undertaken. Such measures must be demonstrated to be necessary, proportionate and effective to address the likely evidenced impacts identified. The review must present the various options in terms of policy wording which might be available for incorporation into the Core Strategy so as to ensure the necessary protection of the European sites.
75. The policies set out in SC8 and HO3 are unduly restrictive and it is unlikely that the nature and scale of the restrictions imposed are required to allow the requirements of regulation 102 to be met. Consideration should be given to adoption of a policy which secures protection of the European sites through the imposition of requirements as regards further data collection, which is the approach adopted by the authors in relation to atmospheric pollution (para 5.5.12 A 2014). In accordance with the "soundness test" (para 182 National Planning Policy Framework) the Core Strategy should adopt the most appropriate strategy when considered against the reasonable alternatives and deliver sustainable development consistent with national policy. Unduly restrictive policies which go further than is necessary, in the context of a core strategy which is a high level document, to secure protection of the relevant European sites will not meet the soundness test.
76. The present Core Strategy PD policies SC8 and HO3 cannot be justified by reference to the AA 2013 and AA 2014 and as such cannot be retained.
77. As explained above, given the high level nature of, and lack of detail in, the Core Strategy it is likely to be necessary for the Core Strategy to contain within it a policy akin to the present Policy. This will provide the necessary protection to ensure that any impacts that are unforeseen at the Core Strategy stage are addressed later. However the present wording of Policy EN2 is not legally

compliant as it fails to reflect the provisions of Article 6(4) Habitats Directive as implemented by regulations 103 and 105 of the 2010 Regulations.

Policy EN2: Biodiversity and Geodiversity

North and South Pennine Moors

A. Any development that would be likely to have a significant effect on a European Site either alone or in combination with other plans or projects will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there will be no adverse effects on site integrity then the project will have to be refused.



baker*consultants*

Appendix Three

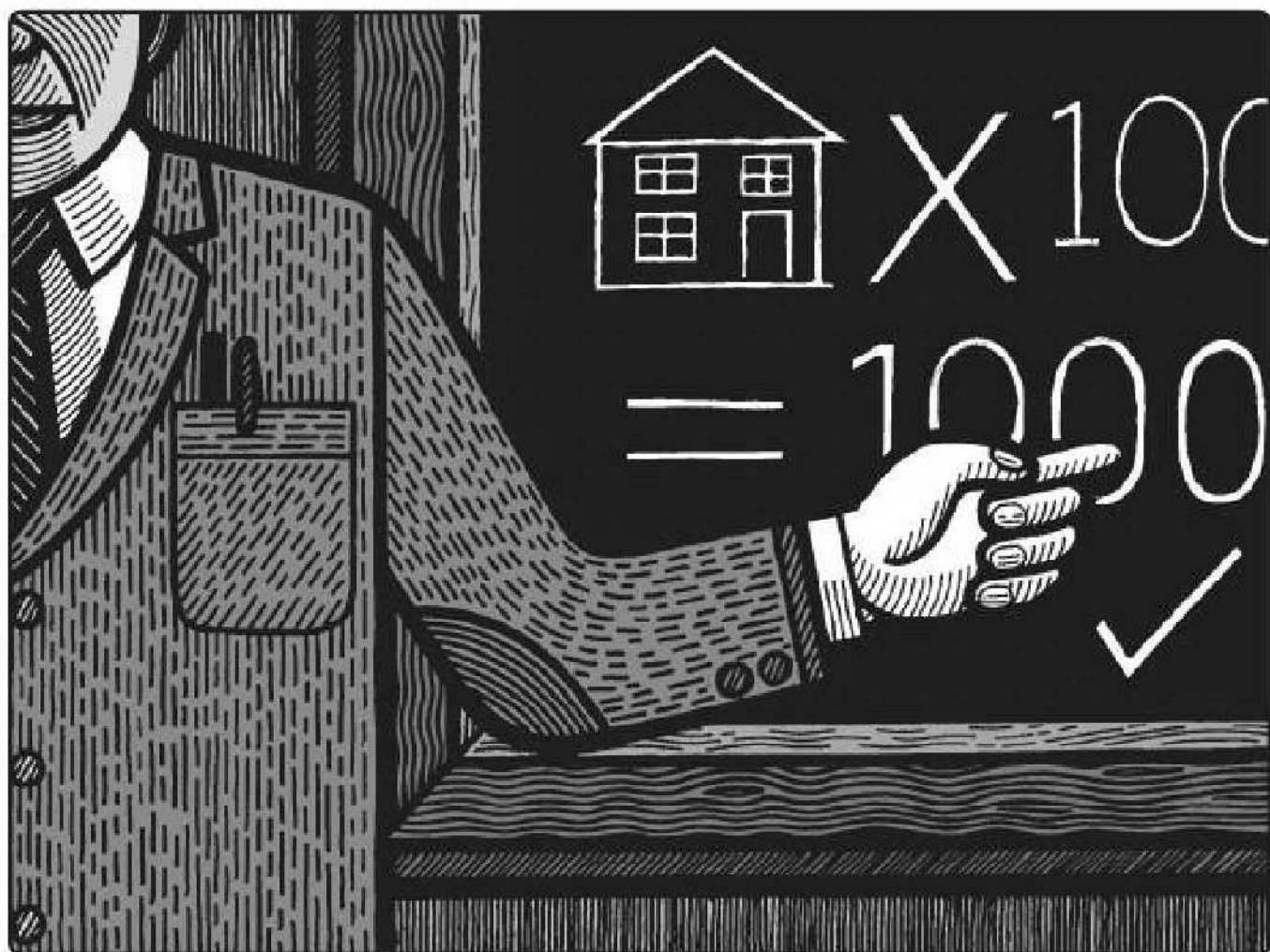
REPRESENTATIONS TO THE BRADFORD CORE STRATEGY PUBLICATION DRAFT (February 2014)

On behalf of Barratt and David Wilson Homes, Miller Homes, Redrow Homes, Skipton Properties and Taylor Wimpey UK

Town & Country Planning Tomorrow Series Paper 16

new estimates of housing demand and need in england, 2011 to 2031

By Alan Holmans



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Cover illustration by Clifford Harper. www.agraphia.com

key headlines

- 1 There was an abrupt break with longer-term trends in household formation in England between 2001 and 2011. Net additional household formation was down by some 20%, with almost 1 million fewer one-person households in 2011 than had been projected.
- 2 There were also other large-scale shifts in the mix of household types, with far more couple-plus-other-adult households and multi-adult households than expected. In part this is about younger people staying at home or sharing accommodation for longer. But that is not the whole story as changes are observed in all age groups.
- 3 Drawing on the evidence from the 2011 Census, DCLG has published only interim household projections to 2021, and the proportions of household types are based on only two points (2001 and 2011). The projections therefore include the effects of the financial crisis and the subsequent recession, but these factors are not the whole reason why household formation was so far below trend.
- 4 This study has both extended the official projections to 2031 (required for land use planning and other planning purposes) and has also looked at the impact of a partial return to longer-term trends. This paper provides estimates of the number of households, housing requirements, and the split between market and social/affordable housing at national and regional levels.
- 5 Table H1 summarises the results of the different projections and includes the 2008-based projections (in the '2011' column) as a reflection of earlier expectations. The 2011-based estimates show considerably lower rates of household formation – but there is still, at the least, almost a 20% increase in the number of households over the 20-year period from 2011 to 2031.
- 6 These projections, which include higher population estimates than in the past but lower household formation rates, together with adjustments for second homes and vacancies in the stock, suggest that some 240,000-245,000 additional homes will be required each year to meet newly arising demand and need.
- 7 Applying past trends based mainly on household composition would suggest that some 68% of the additional homes would be in the market sector (owner-occupation or private renting without benefits), but that nearly one-third of newly arising need would require below-market prices and rents.
- 8 As has been clear from the evidence of the last few years, some of these requirements will be suppressed if affordability worsens or the economy remains in recession. However, these are not outcomes for which it would be prudent to plan.
- 9 At the regional level, not far short of a quarter of all the required new housing is likely to be concentrated in London, with over 60% in the four southern regions. But all regions require significant additional housing investment.
- 10 These projections are based on past trends in sector shares and an eventual return to long-term trends in output. They can only form a starting point for understanding future investment requirements. But lower levels of output will put increasing strains on the housing market, worsening affordability and restricting access to adequate housing. And if, as we all hope, the economy moves back towards longer-term patterns of growth, even more housing investment will be required to meet resultant demands.

Table H1
Household estimates for 2011, 2021 and 2031

	2011	2021	2031
thousands			
'Modified trend projection'	22,102	24,332	26,593
2011-based official projection	22,102	24,307	-
'Extended official projection'	-	-	26,326
Long-term trend (2008-based official projection)	22,389	24,843	27,124

executive summary

Past trends (1961-2001) in household formation broke down between 2001 and 2011

The 2011 Census showed that the change in the total of households in England since 2001, and changes in the mix of types of households, were substantially different from previous estimates and projections. Prior to the new household projections published by the Department for Communities and Local Government (DCLG) in April 2013,ⁱ which took on board the 2011 Census results, the most recent set of projections were 2008-based.ⁱⁱ Apart from adjustments to take on board evidence from the Labour Force Survey about declining household formation rates at the younger ages, the 2008-based projections depended on long-term trends in household formation since 1971. Table S1 shows the Census totals for 1991 and 2001; and for 2011 the 2008-based projection and the 2011 Census total. The changes between 1991 and 2001 were very similar to 1971-81 and 1981-91, and were carried forward to 2011 in the 2008-based projection (and in previous post-2001 projections). However, the 2011 Census figures were very different.

The difference of 287,000 between the projected and the Census total of households in 2011 shown in Table S1 is less than the like-with-like difference due to the Census population total being higher than the 2008-based projection. A hypothetical household total for 2011 derived using the 2008-based population

and the 2011 Census household representative rates would be 375,000 lower than the 2008-based projection. That makes a difference of 1.7% to the total of households, which may not appear large. But it is 20% of the projected net increase in households.

There were substantial differences between the projected and Census figures for numbers of households of individual types. The extreme instance is one-person households, where there is a difference of nearly 1 million. About one-fifth (200,000) was probably due to more adult sons and daughters living with their parents. However, this was far from being the sole cause, because differences between the trend projection and the Census numbers of one-person households occurred in other age ranges as well.

Future numbers of households

The household projections published in April 2013 reach only to 2021, as does the 2011-based population projection by the Office for National Statistics (ONS) from which they are derived. Important uses for household projections (such as land use planning and other planning uses) require a 20-year period. This study therefore extends the population projection and the household projection to 2031. The method used by ONS to project the population to 2021 allows the population of household-forming age to be extended to 2031.

Table S1
Household estimates and projections for England in 1991, 2001 and 2011

	1991 (Census)	2001 (Census)	2011 (projected)	2011 (Census)
thousands				
Couples, no other adults	8,852	9,151	9,579	9,465
Couples, one or more other adults	2,779	2,290	1,925	2,508
<i>(All couples)</i>	<i>(11,631)</i>	<i>(11,441)</i>	<i>(11,504)</i>	<i>(11,973)</i>
Lone-parent households	982	1,438	1,811	1,712
Other multi-person households	1,499	1,341	1,301	1,632
One-person households	5,052	6,304	7,773	6,785
All households	19,164	20,523	22,389	22,102

Minor apparent discrepancies in totals are due to independent rounding

i Household Interim Projections, 2011 to 2021, England. Department for Communities and Local Government, Apr. 2013. www.gov.uk/government/publications/household-interim-projections-2011-to-2021-in-england

ii Household Projections, 2008 to 2033, England. Housing Statistical Release. Department for Communities and Local Government, Nov. 2010. www.communities.gov.uk/documents/statistics/pdf/1780763.pdf

The central question for the household projection is whether what happened in 2001-11 was a structural break from a 40-year trend; or whether household formation was forced downwards by economic and housing market pressures that are likely to ease with time. At the time of the 2011 Census, the British economy was still in recession and the housing market was depressed. The working assumption in this study is that a considerable part but not all of the 375,000 shortfall of households relative to trend was due to the state of the economy and the housing market. 200,000 is attributed to over-projection of households due to the much larger proportion of recent immigrants in the population, whose household formation rates are lower than for the population as a whole. This effect will not be reversed. The other 175,000 is attributed to the economy and the state of the housing market and is assumed to gradually reverse. The projection derived in this study taking these factors into account is termed the

'modified trend projection', and is shown in Table S2 along with an extension of DCLG's projection (the 'extended official projection') and (to represent the long-term trend) DCLG's 2008-based projection.

Future housing requirements

The number of dwellings required to match the projected numbers of households given in Table S2 includes an increase in second homes and the additional vacant dwellings required for a constant vacancy margin. For the 20-year period 2011-31 these are put at 240,000 and 135,000, respectively. They are included in the figures given in Table S3. The figures are divided between the market and social sectors and are given for each region. The division between sectors is derived from the way in which housing tenure varies with type of household and age.

There are many uncertainties about the figures, but clearly the prospect is for large numbers of new dwellings to be needed, in both sectors, and in all regions. The high figure for London (23% of the national total) is the result of the population projection for London for 2011-21, carried forward (as for all regions) for a further ten years to 2031. The household projection derived from it – a net increase of over 1 million in the two decades – is purely demographic and takes no account of possible physical shortages of space.

The estimate of future demand and need is a normative calculation based on future numbers of households. If many fewer dwellings are built, shortages of accommodation and worsening affordability could force household formation downwards. But the consequence would be increasingly severe housing stress and strain.

Table S2
Household estimates for 2011, 2021 and 2031

	2011	2021	2031
thousands			
'Modified trend projection'	22,102	24,332	26,593
2011-based official projection	22,102	24,307	–
'Extended official projection'	–	–	26,326
Long-term trend (2008-based official projection)	22,389	24,843	27,124

Table S3
Projected newly arising demand and need for housing in England and its regions, 2011-13 – annual averages

	Market sector	Social sector	Total
		thousands	
North East	5.3	3.8	9.0
North West	11.5	8.1	19.6
Yorkshire and Humber	13.6	7.1	20.7
East Midlands	16.4	4.1	20.5
West Midlands	13.8	7.0	20.8
East of England	21.8	8.8	30.6
London	31.4	25.1	56.4
South East	33.1	8.7	41.7
South West	18.2	6.0	24.2
England	164.8	78.5	243.3

Minor apparent discrepancies in totals are due to independent rounding

Appendix Four

REPRESENTATIONS TO THE BRADFORD CORE STRATEGY PUBLICATION DRAFT (February 2014)

On behalf of Barratt and David Wilson Homes, Miller Homes, Redrow Homes, Skipton Properties and Taylor Wimpey UK

First Time Buyer Monitor

August 2013

 Under embargo until 00:01hrs Friday 6th September 2013


The most advanced monitor of first-time buyer activity available

FIRST-TIME BUYERS RISE 45% YEAR-ON-YEAR IN JULY

- Highest number of first-time buyers since November 2007
- 26,100 first-time buyer transactions in July, up 8,100 from July 2012
- First-time buyer mortgages becoming more affordable: average rate of first-time buyer mortgages has fallen from 4.92% to 3.99% over last twelve months
- But the pace of recovery slowed as deposits grow as proportion of income – largely the result of rising house prices and weak wage growth
- Average purchase price for a first-time buyer rises 8% in the last year to £146,726 in July

The number of first-time buyers rose 45% year-on-year in July, thanks largely to a sharp fall in mortgage rates, according to the latest First Time Buyer Monitor from LSL Property Services.

There were 26,100 first-time buyer sales in July, 8,100 more than twelve months ago. It was the highest number of first-time buyers since November 2007, indicating the improvement in the first-time buyer market is gathering even more momentum.

A sharp increase in the affordability of mortgages drove the improvement. The average mortgage rate fell from 4.92% in July last year, to 3.99% this year, attracting more buyers to the market. Rates have now fallen every month for the last year, as banks are passing cheap credit from Funding for Lending onto borrowers.

The cheaper rates meant that mortgages were more affordable for first-time buyers. The proportion of income represented by mortgage repayments fell year-on-year from 21.6% to 20.4%.

	Transactions	Average Purchase Price (£)	Average LTV
July 2013	26,100	£146,726	79.5%
June 2013	25,300	£146,250	79.6%
1 month change	+3.2%	+0.3%	-0.1% (from 79.6%)
3 month change	+40.3%	+8.0%	-0.9% (from 80.4%)
1 year change	+45.0%	+8.0%	-0.4% (from 79.9%)

But there are warning signs ahead, with rapidly rising house prices threatening to price the next wave of first-time buyers out of the market. Deposits now represent a far greater proportion of the income of a first-time buyer, and are rising. The average deposit is now equal to 83.1% of annual income, up 5.0% on July last year – slowing the pace of the recovery in first-time buyer lending. This was a result of rising house prices, which have pushed average deposits skyward, despite banks' willingness to lend to those with a smaller deposit size.

The average purchase price for a first-time buyer rose by 8% year-on-year in July, and is now £146,726. This was 0.3% higher compared than in June, when the average purchase price was £146,250 and 6.0% higher than the average price so far this year, which was £138,353.

And the average LTV for a first-time buyer remained broadly flat – down 0.4% year-on-year to 79.5% in July, and down just 0.1% from June.

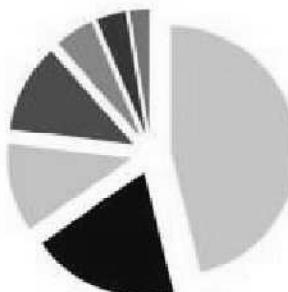
First-Time Buyer Affordability

	Average deposit (£)	Deposit as proportion of income	Average mortgage rate	Mortgage repayment as proportion of income
July 2013	£30,109	83.1%	3.99%	20.4%
June 2013	£29,845	83.2%	4.06%	20.7%
1 month change	+0.9%	-0.1%	-0.07%	-0.3%
3 month change	+13.1%	+6.7%	-0.25%	+0.1%
1 year change	+10.0%	+5.0%	-0.93%	-1.2%

David Newnes, director of LSL Property Services, owners of estate agents Your Move and Reeds Rains, said: *"Mortgages are much more affordable for first-time buyers compared to last year, which has opened the door to thousands of would-be buyers who were shut out of the market. Economic confidence is returning, nudging many more buyers in the direction of property, and nudging lenders to offer more loans to buyers with smaller deposits. Rates have fallen sharply, and there are good deals to be had for savvy first-time buyers, which has made a mortgage much easier to come by. The uptick in confidence, beneficial to both parties, is contagious."*

"But there is a down-side to the good news. There is simply not enough housing stock to match continued demand. If supply fails to keep pace with demand the housing market will become increasingly unsustainable. Prices will rise sharply, and future first-time buyers will be left in the lurch. There is a desperate need for further cheap property in order for the run of success to continue."

Constraints preventing house purchase in July 2013



- Lack of cash deposit (46%)
- Transaction costs like stamp duty and legal fees are too high (19%)
- Concerns about interest rate rises pushing up mortgage payments (12%)
- Insufficient income to support mortgage (12%)
- Worries about decreasing income (5%)
- Concerns about unemployment (4%)
- Concerns over falling house prices (3%)



The Aspiration Gap

In July, 98% of registered tenants wanted to become a homeowner, up 2% from April, and 9% higher than in December, but only 12% are expecting to buy before the end of the year. Almost half (49%) are expecting to buy in the next five years, a significant increase from the start of the year. In December, only a third (36%) of tenants expected to buy in the next five years.

And tenants currently unable to become first-time buyers named the inability to save for a deposit as the biggest stumbling block to homeownership. More than half (46%) are unable to buy as they can't save for a deposit, and a growing number of potential first-time buyers (19%) are concerned that rising costs like stamp duty will get in the way – up by a third from just 13% in December 2012.

London & the South East VS the rest of the UK

The concerns over building a deposit are even more apparent in London and the South East. In this region, 55% of tenants who can't afford to buy are prevented by high deposit requirements, 12% higher than in the rest of the UK. This is a result of prices in the capital rising more quickly than the rest of the UK. The latest England and Wales house price index from LSL shows that house prices in London have risen by 7.1% over the year to June, whilst prices in England and Wales as a whole rose by just 2.2%

Transaction costs such as legal fees and stamp duty are more of a concern to tenants in London and the South East, with over a quarter (27%) naming these costs as a key factor blocking them from purchasing property, compared to just 16% in the rest of the UK. Worries about having enough income for repayments played a lesser role than in the rest of the UK, concerning just 8% of potential first-time buyers.

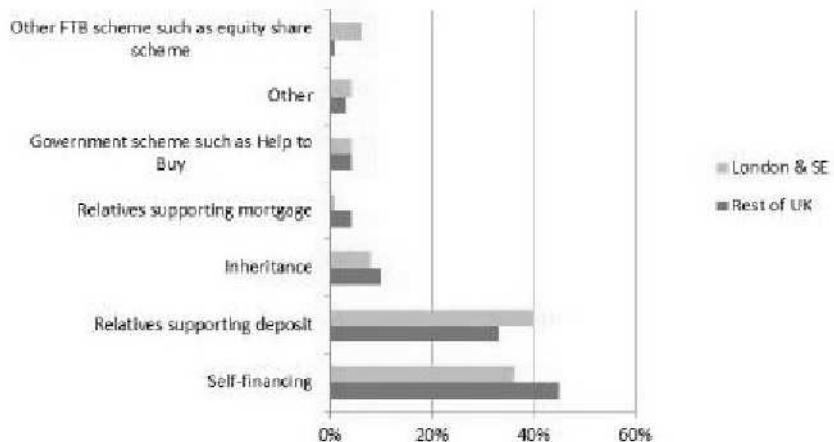
David Newnes continues: *"It remains a huge challenge for first-time buyers to purchase property in the capital. House prices are more expensive, and the size of deposit required dwarfs that in the rest of the country. It's the reason why six out of ten tenants in London can't afford to buy. And there are further concerns for the London market. Higher legal fees and stamp duty costs are turning further first-timers off buying."*

The profile of a first-time buyer

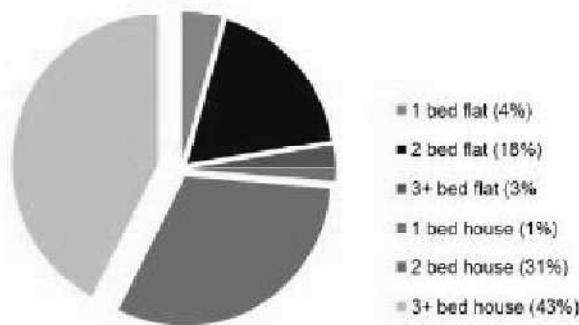
The average first-time buyer in July was 30 years old, with an annual salary of £36,299 per annum, 4% higher than in July 2012, when the average salary was £34,936.

The number of first-time buyers who were able to self-fund their purchase fell to 41% in July, from 51% in April. 36% of all first-time buyers in the UK received financial help to put together a deposit from parents or relatives, whilst 9% benefitted from an inheritance, and 2% received familial help

Financial Help for FTBs in July 2013



Type of housing purchased in July 2013



with mortgage repayments. 4% received financial help from a government scheme such as Help to Buy, up from 1% in April.

Once again, Londoners need the most help to get onto the ladder, with 44% of all first-time buyers in London receiving help towards a deposit, compared to just 33%, and just 36% of buyers able to self-finance.

44% of all first-timers were looking for houses with three or more bedrooms, and the second most popular property type were two bedroom houses (31%). Flats continue to attract far fewer first-time buyers – with just a quarter of buyers looking for flats rather than houses.

Why buy now?

Four in ten (41%) first-time buyers said they were choosing to buy now as they had only recently been in a position financially stable enough to purchase a property, while a quarter (26%) chose to buy to own a house with their partner, and a second quarter (25%) feel it is time for them to settle down. Only 8% bought for investment purposes, expecting house prices to rise, down from 11% in April.

And first-time buyers are confident that the value of property is set to rise. Almost half (46%) of UK first-time buyers think that house prices will rise by up to 5% in the next year, while a further two in ten (18%) believe prices will rise between 5% and 10%. Only three in ten (28%) first-time buyers believe prices will remain flat in the next year, while less than 4% believe prices are likely to fall.

	Transactions	Average Purchase Price	Average LTV	Average Deposit	Average Initial Rate	Mortgage Payments as % of income	Deposit as % of income
Mar-11	15,300	£126,124	80.15%	£25,034	5.05%	21.6%	75.9%
Apr-11	14,300	£130,500	80.51%	£25,431	5.06%	22.0%	75.4%
May-11	14,800	£130,153	80.42%	£25,490	5.02%	21.9%	75.8%
Jun-11	18,500	£132,494	80.84%	£25,380	5.00%	22.4%	75.7%
Jul-11	17,600	£133,125	81.11%	£25,151	4.93%	22.2%	74.1%
Aug-11	18,300	£135,000	81.53%	£24,929	4.86%	22.3%	72.9%
Sep-11	18,500	£132,813	81.67%	£24,339	4.72%	22.0%	72.5%
Oct-11	16,800	£132,500	81.10%	£25,037	4.47%	21.5%	75.2%
Nov-11	17,500	£134,375	79.90%	£27,007	4.33%	20.9%	80.3%
Dec-11	18,600	£137,298	80.06%	£27,373	4.36%	21.3%	80.7%
Jan-12	12,800	£134,995	80.32%	£26,567	4.39%	21.1%	78.3%
Feb-12	14,000	£135,000	79.72%	£27,377	4.44%	21.3%	81.7%
Mar-12	24,400	£146,713	79.94%	£29,435	4.56%	22.5%	84.1%
Apr-12	12,300	£123,694	79.92%	£24,842	4.66%	20.9%	77.5%
May-12	17,700	£131,245	80.52%	£25,572	4.82%	21.7%	76.3%
Jun-12	19,400	£137,469	80.42%	£26,913	4.91%	22.6%	79.2%
Jul-12	18,000	£135,802	79.91%	£27,281	4.92%	21.6%	78.1%
Aug-12	20,400	£137,250	79.50%	£28,133	4.91%	22.0%	81.4%
Sep-12	17,600	£135,000	80.20%	£26,735	4.86%	22.0%	78.6%
Oct-12	20,000	£135,000	80.19%	£26,747	4.81%	21.8%	78.3%

FIRST-TIME BUYERS RISE 45% YEAR-ON-YEAR IN JULY

Month	Number of buyers	Average price	Deposit as a % of price	Average deposit	Deposit as a % of LTV	Deposit as a % of salary	Deposit as a % of household income
Nov-12	21,700	£134,063	79.08%	£28,045	4.72%	21.2%	82.4%
Dec-12	19,500	£137,025	79.91%	£27,533	4.60%	21.6%	80.7%
Jan-13	15,800	£133,750	79.85%	£26,944	4.44%	20.8%	79.2%
Feb-13	15,900	£132,813	79.76%	£26,876	4.33%	20.6%	79.6%
Mar-13	19,600	£135,938	80.57%	£26,407	4.29%	20.8%	76.7%
Apr-13	18,600	£135,802	80.40%	£26,623	4.24%	20.3%	76.4%
May-13	24,300	£137,195	80.09%	£27,310	4.19%	20.0%	77.1%
Jun-13	25,300	£146,250	79.59%	£29,845	4.06%	20.7%	83.2%
July-13	26,100	£146,726	79.48%	£30,109	3.99%	20.4%	83.1%

- Ends -

Methodology

LSL uses the extensive monthly data from registered first time buyers in its estate agency brands Your Move and Reeds Rains to update the CML's first time buyer data before the CML's RMS data is published. The term 'first time buyer' is here denoted by the purpose of a buyer's registration, rather than their LTV. LSL LTV data has been applied to CML price purchase data to calculate deposit and affordability information. Sentiment and salary data are derived from a survey conducted by LSL. The figures are not mix or seasonally adjusted, and are subject to revision as more data becomes available.

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First Time Buyer Tracker

February 2014

 The most advanced monitor of first-time buyer activity available

AVERAGE FIRST-TIME BUYER DEPOSIT HITS £27,500 IN JANUARY AS PRICES CLIMB 16% IN A YEAR

- Average first-time buyer purchase price hits new high of £155,832 – up £5,000 in a month
- But high loan to value lending is on the up, average LTV for new buyers rises to 82.3%
- First-time buyer numbers up by a third year-on-year
- However repayments increase as a proportion of income, as real wages stay stagnant

	Transactions	Average Purchase Price (£)	Average LTV
January 2014	20,700	£155,832	82.3%
December 2013	26,700	£150,875	82.1%
1 month change	+22.5%	+3.3%	+0.2% (from 82.1%)
3 month change	+21.3%	+6.3%	+1.2% (from 81.1%)
1 year change	+31.0%	+16.4%	+2.5% (from 79.9%)

The average first-time buyer purchase price climbed 16% over the year to January 2014, hitting a record high of £155,832, according to the latest First Time Buyer Tracker from LSL Property Services. It represented a 3.3% monthly increase in purchase price, equivalent to a jump of £5,000.

This increase in purchase price has driven a rise in deposit size. The average first-time buyer deposit rose to £27,519 in January 2014 – from £26,963 twelve months before.

And for the first time in seven months, deposits are growing as a proportion of income. The average deposit represented 75.1% of a first-time buyer's income in January 2014, up from 74.7% in December 2013.

This was the result of the differing speeds of recovery in the economy. While house prices have raced ahead, wages have been much slower to pick up. The latest ONS statistics showed total pay increased by just 1.1% over the year to December. Factor in inflation, which tracked at 2% over the same time period, and real wages have actually been *falling*. Deposits are forming a larger proportion of take-home pay.

David Newnes, director of estate agents Your Move and Reeds Rains, part of LSL Property Services group, said: "While the property market has been firing forwards, wage growth has been stuck in the



mud of the economic recovery. Prices for first-time buyer properties have been marching steadily upwards, and have now reached a new record.

"The property market has remained accessible to first-time buyers, because an increase in high LTV lending has offset rising prices. This is enabling more first-time buyers to enter the market."

First-Time Buyer Affordability

	Average deposit (£)	Deposit as proportion of income	Average mortgage rate	Mortgage repayment as proportion of income
January 2014	£27,519	75.1%	4.10%	22.4%
December 2013	£26,964	74.7%	4.04%	21.8%
1 month change	+2.1%	+0.4	+0.06	+0.6
3 month change	-0.7%	-1.9	+0.16	+1.6
1 year change	+2.1%	-4.2	-0.34	+1.6

High LTV lending is helping first-time buyers enter the market, as prices – and deposits – increase. The average first-time buyer LTV has risen 2.5% over the past year to 82.3% – the highest on record.

The number of first-time buyer transactions is a third (31%) higher than in January 2013. There are also strong signs that first-time buyer transactions will pick-up further in February. The latest e.surv Mortgage Monitor showed that lending to borrowers with a deposit of 15% or less – typically first-time buyers – bounced back from a festive dip in January. High LTV borrowers accounted for almost one in seven (14%) house purchase loans in January, up from one in eight (12%) in December. This increase in high LTV lending should filter through to even more first-time buyer transactions in February.

David Newnes, director of estate agents Your Move and Reeds Rains, part of LSL Property Services group, said: *"Although Mark Carney has revised forward guidance and assured borrowers that a base rate rise isn't imminent, we still need to support the bottom of the market. As first-time buyer house prices continue their upward climb, Help to Buy is needed more than ever to keep the market accessible to all. But the market needs more than that. Far more house-building must come hand-in-hand with more high LTV lending. More building will ensure Help to Buy doesn't become a permanent crutch to the market; we need to increase our stock of affordable homes and reduce the competition between buyers to ensure a sustainable recovery."*

REGIONAL SNAPSHOT

London and the South East were home to 38% (28,100) of UK first-time buyer transactions – 13,000 in the capital and 15,100 in the South East.

The average deposit was £64,160 in the capital and £39,146 in the South East, considerably higher than in all other UK regions. By comparison, the average first-time buyer deposit was just £13,393 in Northern Ireland and just £13,814 in Wales.

First-time buyers also paid the most for their homes in London. The average first-time buyer purchase price rose to £282,537 – a new record. The cheapest region was Northern Ireland, where the average first-time buyer purchase price was just £87,839.

SEE FULL REGIONAL MAP OVERLEAF



Regional Map of First-Time Buyers

North West	3 months to Jan 2014
Purchase Price	£112,634
Average Deposit	£15,139
Average Mortgage	£97,495
Number of FTBs*	7,100

Scotland	3 months to Jan 2014
Purchase Price	£98,382
Average Deposit	£17,454
Average Mortgage	£80,928
Number of FTBs*	6,600

North East	3 months to Jan 2014
Purchase Price	£108,413
Average Deposit	£16,875
Average Mortgage	£91,538
Number of FTBs*	2,900

Northern Ireland	3 months to Jan 2014
Purchase Price	£87,839
Average Deposit	£13,393
Average Mortgage	£74,446
Number of FTBs*	1,600



Yorkshire & Humber	3 months to Jan 2014
Purchase Price	£120,700
Average Deposit	£15,600
Average Mortgage	£105,100
Number of FTBs*	5,700

West Midlands	3 months to Jan 2014
Purchase Price	£129,708
Average Deposit	£21,468
Average Mortgage	£108,239
Number of FTBs*	5,900

East Midlands	3 months to Jan 2014
Purchase Price	£121,041
Average Deposit	£16,674
Average Mortgage	£104,367
Number of FTBs*	4,900

Wales	3 months to Jan 2014
Purchase Price	£92,772
Average Deposit	£13,814
Average Mortgage	£78,958
Number of FTBs*	2,900

East Anglia	3 months to Jan 2014
Purchase Price	£163,415
Average Deposit	£33,270
Average Mortgage	£130,145
Number of FTBs*	2,700

South West	3 months to Jan 2014
Purchase Price	£151,788
Average Deposit	£30,342
Average Mortgage	£121,446
Number of FTBs*	6,100

South East	3 months to Jan 2014
Purchase Price	£189,518
Average Deposit	£39,146
Average Mortgage	£150,372
Number of FTBs*	15,100

London	3 months to Jan 2014
Purchase Price	£282,537
Average Deposit	£64,160
Average Mortgage	£218,377
Number of FTBs*	13,000

* Number of FTBs in Q3 from CML RMS regional data (released 26th November 2013) – grossed up to reflect growth in FTBs recorded by LSL Property Services between Q3 2013 and the three months ending January 2014



Examples of First-Time Buyer Properties

North West
Example FTB Property**
Two bedroom semi-detached bungalow
Millom
£55,000

Scotland
Example FTB Property**
One bedroom semi-detached bungalow
Kennoway
£59,950

North East
Example FTB Property**
One bedroom apartment
Newcastle Upon Tyne
£49,950

Northern Ireland
Example FTB Property**
Three bedroom terrace
Newtownabbey
£44,950



Yorkshire & Humber
Example FTB Property**
Two bedroom terrace
Barnsley
£40,000

West Midlands
Example FTB Property**
Two bedroom terrace
St Helens
£40,000

East Midlands
Example FTB Property**
One bedroom apartment
Nottingham
£55,000

Wales
Example FTB Property**
Two bedroom apartment
Wrexham
£59,950

East Anglia
Example FTB Property**
Two bedroom semi-detached bungalow
Cambridge
£165,000

South West
Example FTB Property**
One bedroom flat
Exmouth
£99,500

South East
Example FTB Property**
Studio Flat
Chatham
£65,000

London
Example FTB Property**
One bedroom flat
Dagenham
£135,000

*** Properties on the market with either Reeds Rains or Your Move estate agents at the time of going to press.*

AVERAGE FIRST-TIME BUYER DEPOSIT HITS £27,500 AS PRICES CLIMB 15% IN A YEAR

	Transactions	Average Purchase Price	Average LTV	Average Deposit	Average Initial Rate	Mortgage Payments as % of income	Deposit as % of income
Mar-11	15,400	£126,244	80.15%	£25,058	5.05%	21.6%	75.9%
Apr-11	14,300	£130,624	80.51%	£25,455	5.06%	21.9%	75.2%
May-11	14,900	£130,500	80.42%	£25,558	5.02%	21.9%	75.8%
Jun-11	18,600	£132,500	80.84%	£25,381	5.00%	22.4%	75.5%
Jul-11	17,700	£133,244	81.11%	£25,173	4.93%	22.2%	74.1%
Aug-11	18,300	£135,000	81.53%	£24,929	4.86%	22.3%	72.9%
Sep-11	18,500	£132,863	81.67%	£24,348	4.72%	22.0%	72.5%
Oct-11	16,800	£132,568	81.10%	£25,050	4.47%	21.5%	75.2%
Nov-11	17,600	£134,391	79.90%	£27,010	4.33%	20.9%	80.2%
Dec-11	18,600	£137,390	80.06%	£27,391	4.36%	21.3%	80.7%
Jan-12	12,800	£135,000	80.32%	£26,568	4.39%	21.0%	78.2%
Feb-12	14,000	£135,000	79.72%	£27,377	4.44%	21.3%	81.7%
Mar-12	24,400	£146,874	79.94%	£29,467	4.56%	22.5%	84.2%
Apr-12	12,300	£123,750	79.92%	£24,853	4.66%	20.9%	77.5%
May-12	17,700	£131,250	80.52%	£25,573	4.82%	21.7%	76.3%
Jun-12	19,400	£137,494	80.42%	£26,918	4.91%	22.6%	79.2%
Jul-12	18,100	£135,802	79.91%	£27,281	4.92%	21.6%	78.1%
Aug-12	20,400	£137,438	79.50%	£28,172	4.91%	22.0%	81.4%
Sep-12	17,600	£135,000	81.29%	£25,259	4.86%	22.3%	74.2%
Oct-12	20,100	£135,000	81.28%	£25,271	4.81%	22.1%	74.0%
Nov-12	21,700	£134,371	79.08%	£28,109	4.72%	21.3%	82.5%
Dec-12	19,500	£137,063	79.91%	£27,541	4.60%	21.6%	80.6%
Jan-13	15,800	£133,844	79.85%	£26,963	4.44%	20.8%	79.3%
Feb-13	15,800	£132,813	79.76%	£26,876	4.33%	20.6%	79.6%
Mar-13	19,600	£136,125	80.57%	£26,444	4.29%	20.8%	76.8%
Apr-13	17,900	£135,802	80.40%	£26,623	4.24%	20.3%	76.3%
May-13	22,600	£137,561	80.09%	£27,382	4.19%	20.1%	77.2%
Jun-13	24,000	£146,250	79.59%	£29,845	4.06%	20.7%	83.1%
Jul-13	24,100	£144,290	79.48%	£29,609	3.99%	20.2%	82.6%
Aug-13	26,400	£146,769	80.30%	£28,912	3.95%	20.6%	80.2%
Sep-13	23,200	£147,156	80.63%	£28,498	3.93%	20.9%	79.9%
Oct-13	26,300	£146,605	81.09%	£27,719	3.94%	20.8%	77.0%
Nov-13	26,400	£145,313	81.30%	£27,177	3.93%	22.8%	76.6%
Dec-13	26,700	£150,875	82.13%	£26,964	4.04%	21.8%	74.7%
Jan-14	20,700	£155,832	82.34%	£27,519	4.10%	22.4%	75.1%

-ENDS-



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Methodology

LSL uses the extensive monthly data from registered first-time buyers in its estate agency brands Your Move and Reeds Rains to update the CML's first-time buyer data before the CML's RMS data is published. The term 'first-time buyer' is here denoted by the purpose of a buyer's registration, rather than their LTV. LSL LTV data has been applied to CML price purchase data to calculate deposit and affordability information. Sentiment and salary data are derived from a survey conducted by LSL. The figures are not mix or seasonally adjusted, and are subject to revision as more data becomes available.

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