

RESPONSE TO PUBLIC CONSULTATION ON THE BRADFORD CORE STRATEGY – MARCH 2014

1. INTRODUCTION

1.1 The Consultation refers to three documents that they would like comments on:

- **Spatial Vision and Strategy – this document looks at the issues relating to the role of the District’s settlements, and options for how they should be managed in terms of delivering housing and employment growth or restraint, up to 2026.**
- **Initial Sustainability Appraisal – this document assesses the social, environmental, economic implications of the four different options for the location of development, and their impact on the achievement of sustainable development.**
- **Settlement Study – this document provides a snapshot of settlements and areas within the Bradford Urban Area and forms an evidence base to support the development of a hierarchy for the location of development at the next stage of the Plan preparation.**

1.2 Bradford also refers to other documentation that has been prepared or will be prepared in support of the Core Strategy:

1. Ecological Assessment The West Yorkshire Ecology Unit has been appointed to provide a sound and justified evidence base to:
 - develop a robust and comprehensive understanding of the ecology and biodiversity for the two AAP areas.
 - minimise impacts on the local natural environment and biodiversity in preparing the development plans to allow net gains in biodiversity where possible.
 - plan for biodiversity at a landscape - scale and identify and map components of the local ecological networks. The results of the Ecological Assessment will also be used to inform the strategic approach to Green Infrastructure, which is being developed for the two AAPs.

1.3 Local Plan Timetable Update - The Council is in the process of preparing a number of Development Plan Documents (DPDs) which will form part of the Local Plan for the Bradford District. The key planning documents are listed below along with an indication of their current progress and anticipated public consultation timetables:

Core Strategy DPD - Draft Publication: February 2014

Allocations DPD - Methodology: Spring 2014

Allocations DPD - Issues and Options: Summer / Autumn 2014

The following studies and updates have been published in support of the Core Strategy:

- Equality Impact Assessment (CSPD)* February 2014
- Growth Study November 2013
- Habitats Regulations Assessment (Appropriate Assessment) May 2013
- Habitats Regulations Assessment (Appropriate Assessment) February 2014

- Health Impact Assessment (CSFED)** October 2013
- Health Impact Assessment – Planning Response February 2014
- Housing Requirements Study February 2013
- Housing Requirements Study Addendum Report August 2013
- Local Infrastructure Plan October 2013
- Local Plan Viability Assessment September 2013
- Playing Pitch Strategy Due Feb 2014
- Retail and Leisure Study May 2013
- Strategic Flood Risk Assessment February 2014
- Strategic Housing Land Availability Assessment (SHLAA) Update May 2013
- Strategic Housing Market Assessment (SHMA) Update October 2013
- Sustainability Appraisal (CSPD)* February 2014
- Waste Needs Assessment and Capacity Gap Analysis work ongoing

2. RESPONSE

Population

- 2.1 I acknowledge that the District had a population of some 522,500 in 2011 which is estimated to increase to 595,799 by 2028, (Bradford District Housing Requirement Study February 2013). The size of this population growth forecast is significant, and is driven mainly by natural growth.
- 2.2 Further more the District's population is also expected to become more ethnically mixed with significant growth among younger age groups, BME groups and within the more deprived areas of the District. This change in population composition and shift towards groups that traditionally experience lower labour market attainment has implications for Bradford's economy, housing and infrastructure.
- 2.3 It is also of significance that a predicted "significant" growth in housing need in Leeds has recently been supported by their Inspector.

Housing

- 2.4 Bradford District has approximately 210,000 dwellings (derived from Council Tax data, 2013) occupied by around 200,000 households (CLG 2011 based Interim Household Projections). The District's housing stock is diverse, ranging from inner city back-to-backs to multi million pound mansions, and almost everything in-between. The age of the housing stock also reflects the growth of the District, with a third of stock being built before 1919. In many ways this unique housing offer is a strength, but it brings with it serious housing condition problems (e.g. non decent housing, overcrowding) that continue to be a major challenge.
- 2.5 House prices in the District are generally lower than Yorkshire & Humber as a whole but there are significant variations between sub areas with comparable properties being worth significantly more in Wharfedale than in the inner city.
- 2.6 When considering the spatial provision of housing the Council and the CS needs to satisfy local demand for housing and allocate sites "where people want to live" ie there is a need to address demand as well as overall need.

Transport and Connectivity

- 2.5 Bradford is in a key strategic location within the Leeds City Region with three rail routes providing public transport connectivity across the District and beyond, access to Leeds Bradford International Airport outside of the District within Leeds, and connections to the strategic highway network via the M606 and M62. Although Bradford has a relatively competitive position in terms of its connectivity to wider

destinations, the District internally faces the challenge of planning for infrastructure delivery to match intensive growth. There are also some key services, employment and housing areas in Bradford that are poorly served by public transport, cycling and walking. BUT this does not apply to Burley in Wharfedale. The road network in Bradford's urban area is characterised by a radial pattern of routes leading to the City Centre, though there is an outer and an inner ring road. There is also a relatively high level of bus use throughout the urban area which is encouraged by a generally good quality and high frequency network.

- 2.6 It is recognised throughout the document that it is important to locate housing close to public transport connections and in particular railway stations.

The Spatial Vision for Bradford District

- 2.7 The document sets out how this vision will be achieved through the following strategic objectives and I support these objectives:

1. To recognise and fully exploit the role of the City of Bradford and the towns along Airedale and **Wharfedale** as dynamic locations of **choice for housing** and economic growth within the Leeds City Region.
2. To ensure that the district's **needs for housing**, business and commerce are met in **sustainable locations** that reduce the need to travel and are **well served by public transport and services**, whilst prioritising, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.
3. Ensure that the appropriate critical infrastructure (including green and social) is delivered to support growth and the timing of development and infrastructure delivery are aligned.
4. To provide **a range of quality dwellings**, in terms of type and affordability, in well designed neighbourhoods to cater for the current needs and future growth of the District.
5. To promote the role of the Bradford District in the Leeds City Region economy by creating conditions for housing growth, city living and enterprise where business thrives, generating opportunity, prosperity and jobs.
9. To improve and develop excellent public transport and highway systems to increase the level of accessibility within the District and establish good connections with other parts of the Leeds City Region and the country by ensuring **safety, efficiency and sustainability**.
10. To ensure that Bradford is a diverse city where socially inclusive and vocal communities live and where **the needs of citizens are met through improved access to good quality homes**, jobs, shopping, cultural facilities, health and education provision and community facilities for a growing population.
11. To **provide a clean, safe, secure, sustainable, attractive and accessible built and natural environment** in order to reduce the fear of crime and disorder and foster a shared sense of civic pride and responsibility.
12. Safeguard, enhance and promote the diverse historic built and natural heritage of the District which helps reinforce the local distinctiveness of places.
13. To reduce the impact of climate change through mitigation and adaptation, particularly through reducing pollution, energy consumption, the risk of flooding, and promoting the use of renewable energy and securing the means to become locally self sufficient.

14. Provide accessible and varied opportunities for leisure and recreation including access to the countryside and the utilisation of green infrastructure spaces and routes for walking and cycling.
15. **Safeguard and enhance the District's biodiversity assets** through careful landscape, woodland and waterways management. In particular the South Pennine Moors and upland fringe.
16. Safeguard and enhance the District's natural and renewable energy resources, including water, agriculture, woodland and minerals, and promote the sustainable management of waste.

Strategic Core Policy 3 (SC3): Working Together

2.8 **It is encouraging to see that** - Planning decisions as well as plans, strategies, investment decisions and programmes should be based on:

- **Effective collaboration between the Council, adjoining local planning authorities, the District's Town and Parish Councils, partners and communities**

Hierarchy of Settlements

- 2.9 I recognise the use and articulation of a settlement hierarchy in guiding and controlling the distribution of growth and development and that it is a tool already used and established within both the RUDP and the RSS and one which can play a major role in establishing a sustainable pattern of growth and development across the district. However I question the continued use of the RUDP and RSS approaches that were based upon a range of old detailed evidence and analysis, including the Regional Settlement Study of 2004, which is obviously now 10 years old. LPA's have been advised to abandon the use of the RSS. It is important that the principles behind them are NOW tested debated and adjusted within this Core Strategy to reflect the challenges and circumstances facing the district both now and up to 2030.
- 2.10 While broadly in line with the approach of the now revoked RSS the Core Strategy Claims to have taken the opportunity to the use the information contained within Bradford's own settlement study and the practicalities of the land supply situation to make some adjustments to the core RSS settlement hierarchy approach. The Core Strategy has made two significant changes. Firstly it has added a Principal Town (Bingley) allegedly reflecting the town's role in providing homes, jobs, services and cultural activities to the area. However I would contend that its addition is more likely down to its importance within the Airedale Strategy's regeneration proposals. This questions the robustness of Bradford's own settlement study and the lack of empirical evidence to support its conclusions.
- 2.11 Secondly Bradford has added an additional tier of 'Local Growth Centres' between the Principal Towns and much smaller Local Service Centres. This is "justified" it says by the land supply constraints in the upper two tiers and the fact there are significant differences in the characteristic of the settlements below the Principal towns level and their ability to grow in a sustainable way.
- 2.12 A policy is introduced seeking to both identify the key differences in scale and nature of development envisaged between the different parts of the district and give a more spatially specific outline of the key priorities for plans, strategies and investment decisions at each tier of the settlement heirarchy. Figure SS2 illustrates the Districts settlements and their respective sub area grouping.
- 2.13 **Here lies a key issue – the alignment of the hierarchy with the "PRINCIPLE" of where housing development should be located ie should it be based on existing settlement patterns and existing sizes of those settlements or the "capacity" of those settlements in terms of social and physical infrastructure and the "availability of "suitable sites"?. The following hierarchy for example**

states that Ilkley, as a Principal Town, should be a major the focus for housing development. However for example many residents of Ilkley will be staunchly opposed to any development for all sorts of reasons and this opposition may result in the site allocations DPD failing to provide the requisite housing numbers. Whilst recognising that the CS is NOT an allocations documents, it should reflect some likelihood of success of and of the probability of “delivery” of the housing numbers contained in the CS.

Principal Towns

A. Ilkley, Keighley and Bingley will be the main local focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities.

Local Growth Centres

A. Queensbury and Thornton are sustainable local centres accessible to the Regional City of Bradford and Steeton with Eastburn, and Silsden, are sustainable local centres within Airedale. All are located along key public transport corridors and should therefore make a significant contribution to meeting the districts needs for housing, employment and provide for supporting community facilities.

B. The roles of, Steeton with Eastburn, Silsden, Queensbury and Thornton as accessible, attractive and vibrant places to live, work and invest should be enhanced.

Local Service Centres and Rural Areas

Within the Local Service Centres of Addingham, Baildon, **Burley In Wharfedale**, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Menston, Oakworth, Oxenhope, Wilsden the emphasis will be on smaller scale developments which meet local needs together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions.

- 2.14 Some would argue that Burley in Wharfedale should be advanced to a “Local Growth Centre” – due to its sustainable location, good access to quality public transport and the availability of good deliverable sites in a location where people want to live.

3. The District’s Housing Requirement

- A. Provision will be made within the Local Plan to facilitate the scale of new housing development as set out in Table HO1.**
- B. After allowing for net completions over the period 2004-13 and an allowance for the projected reduction in the number of vacant homes, the Local Plan will allocate land to meet the remaining requirement for at least 42,100 homes over the period 2013 to 2030;**
- C. Forthcoming DPD’s will assess the projected losses to the existing housing stock from clearance and change of use and increase the level of allocations to compensate accordingly.**

Table HO1: Bradford District Housing Requirement

A	Statutory Development Plan Housing Requirement 2004 - 8 (1560 x 4) = 6,240
B	Statutory Development Plan Housing Requirement 2008 - 11 (2700 x 3) = 8,100
C	Housing Requirement Study Based Housing Requirement 2011 - 13 2200 x 2 = 4,400
D	Total Housing Requirement 2004 - 13 A + B + C = 18,740
E	Net Completions 2004 - 13 (From AMR) = 11,053
F	Residual unmet Need 2004 - 13 D - E = 7,687
G	Housing Requirement Study Based Housing Requirement 2013 - 30 2200 x 17 = 37,400
H	Total Housing Requirement 2004 - 30 D + G 56,140
I	Net Completions 2004 - 13 = 11,053
J	Allowance for Reduction in Vacant Homes = 3000

3.1 As set out in Policy HO1 and Table HO1 there are a number of key variables which combine to produce the housing requirement for the district. The Housing Requirement Study's base date is 2011 and the estimated annual need from that period is taken to be 2200 dwellings in line with the report's recommendations. The NPPF requires that the Local Plan makes provision for a period of 15 years from the expected date of adoption of the plan. Since the expected date of adoption of the Core Strategy has slipped to early 2015 the Housing Requirement must cover the period to 2030 rather than 2028 as envisaged when the study was commissioned. The Council has therefore simply applied the study's findings for an additional 2 years. **I have chosen not to comment on this simplistic approach but I am surprised at the absence of a specific 5 year housing supply figure. It is referred to later along with the two phases approach but this not seem to comply with the requirements of the NPPF.** The Government also requires that the Housing Requirement includes an allowance for any unmet need or under supply over the period preceding the new plan. Table HO1 of the Core Strategy therefore includes an assessment of net completions compared to housing targets over the period 2004-11. When completions over 2011-13 are factored in there has been an overall under supply of 7,687 dwellings over the period. This is corroborated by the fact that household growth over this period has far exceeded the number of dwellings provided and this has been one of the factors in the growing demand for social housing and significant problems of over crowding in parts of the district. This under supply figure has therefore been added to the requirement. Having assessed and set out the scale of housing required to meet need over the plan period it is also important to indicate in very broad terms how this requirement will be met.

3.2 Policy HO2 therefore describes the main sources of supply, the balance between existing and known sites and new sites which will need to be identified within the Local Plan, the areas which will see particularly significant housing growth, area based initiatives which are planned or underway to deliver growth and an indication of the need for green belt to meet the housing requirement. It therefore sets out, as required by paragraph 156 of the NPPF, the strategic priorities for the area as far as they apply to meeting housing need. The approach set out within Policy HO2 reflects the scale and distribution of deliverable and developable land within the SHLAA and the strategic objectives of this Core Strategy. **This approach relies heavily on the initial analysis of the SHLAA – to my knowledge this has not been in depth study of “deliverability”- please refer to section 3.3 below and the highlighted text.**

SHLAA

Phasing Break Down

Short term deliverable 8,554

Medium term developable 27,432

Long Term Developable 13,872

Residual Developable 3,850

3.3 The SHLAA results illustrate in a number of ways the challenges facing the district in meeting the overall housing target. Although the total deliverable and developable quantum lies well above the district wide housing requirement, this is only because of the contribution made from sites which are subject to a range of current policy constraints including green belt. Because of the enormity of the scale of new housing required and the already evident shortfall in supply **it was not possible for the SHLAA to assess the suitability of sites based on a 'All Policies Switched On' basis.** The **compromise approach** was therefore to discount only those sites where national policy would be reasonably unequivocal that development could not take place.

3.4 The district wide housing requirement of 42,100 was then assigned according to the proportion of **EXISTING** population within the each settlement. The housing

distribution which would result from such an approach is indicated in table HO3 below:

Table HO3: Baseline Distribution of Housing Requirement Based Solely on Population

Bradford City Centre 293 Bradford NE 7,436
 Shipley & Canal Rd Corridor 115 Bradford SW 7,894

Shipley 1,485 Bradford NW 6,222
 Bradford SE 4,878

Ilkley 1,194 Bingley 1,470
 Keighley 4,066
 Queensbury 734 Silsden 633
 Thornton 483 Steeton With Eastburn 346

Addingham 263 East Morton 109
Burley In Wharfedale 518
 Harden 133 Baildon 1,351 Haworth 483 Cottingley 395 Menston 362 Cullingworth 215 Oakworth 315
 Denholme 225 Oxenhope 155 Wilsden 325

3.5

Adjustment of the Baseline Distribution Based on Reality Checking

The baseline distribution does not necessarily reflect either the full range of general principles outlined above and **nor does it reflect the realities of land supply and environmental constraints**. The key factors and evidence which were therefore used to adjust and finalise the housing distribution were as follows:

1. Land Supply (SHLAA)

The updated SHLAA provides data on not only the total deliverable and developable capacity within each settlement but also the nature of that supply including the split between green field and brownfield land and the amount of green belt. The SHLAA therefore provides or should provide the most critical element of the reality checking process. In some cases account has been taken of information on additional supply from planning applications or sites which have emerged since the cut off date for inclusion in the SHLAA.

2. Growth Study

The Growth Study provides a strategic level assessment of which parts of the district would be capable of and most suitable for accommodating growth in the form of urban extensions or local green belt deletions. The key outputs from the study relevant to the consideration of the housing distribution in Policy HO3.

The Local Service Centres

Table HO7: An Indication of How The Proposed Settlement Distribution Departs From the Baseline Population Proportionate Target

Local Service Centres	3350	8.0%	-1501
Addingham	200	0.5%	-63
Burley In Wharfedale	200	0.5%	-318
Baildon	450	1.1%	-901
Cottingley	200	0.5%	-195
Cullingworth	350	0.8%	+135
Denholme	350	0.8%	+125
East Morton	100	0.2%	-9
Harden	100	0.2%	-33
Haworth	500	1.2%	+17
Menston	400	1.0%	+38
Oakworth	200	0.5%	-115
Oxenhope	100	0.2%	-55
Wilsden	200	0.5%	-125

The plan period will be split into 2 phases with phase 1 covering the first 8 years and the second phase the final 7 years of the plan period to 2030. DPD's will therefore need to allocate sufficient land to meet 8/15 of their housing requirement as specified in Policy HO3 within the first phase.

C. Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road DPD's but will be based on the

following principles:

1. **The need to have regard to delivering the overall housing requirement in line with Policy HO1;**
2. **The need to maintain a 5 year supply of deliverable sites as required by the NPPF;**

- 3.6 **I would question the deliverability of each phase, when spread across the 3 DPD's , which are to be produced under differing programmes and timescales and how the 5 year land supply is to be maintained across these 3 plans. How will this be monitored and how will it recognise that there is of course no ability to amend the phasing of each plan (once adopted) in relation to the performance of other/s. The use of phasing policies within the 3 site allocating DPD's will effectively mean that some sites are held back – how and on what basis? from being developed until the second half of the plan period.**

The DPD's involved are:

- **The Shipley and Canal Road Corridor DPD** - The Shipley and Canal Road Corridor is located within the main urban area of Bradford between the city centre and Shipley town centre. In support of Bradford's regeneration priorities it is one of the key locations identified to deliver housing and economic growth in the district. Up to 3200 new homes are planned to be located in the CRC and the area has been identified as one of four Urban Eco Settlements in the Leeds City Region. In line with the sub area policies in the Core Strategy, the AAP will set out planning policies to guide development proposals in the area, along with details of how these proposals will be delivered. Issues and Options stage consultation took place between March and May 2013 with plan adoption expected in 2016.
- **The Bradford City Centre Area Action Plan DPD** - The City Centre AAP will set the vision and spatial strategy in support of the regeneration of Bradford City Centre. It will provide the statutory basis for the implementation of the City Centre Masterplan and associated four Neighborhood Development Frameworks and help deliver developments on the identified sites and in areas of change and constraint. Up to 3500 new homes are planned to be delivered within the City Centre during the plan period. Public consultation on the City Centre AAP Further Issues and Options took place between March and May 2013 with adoption expected in 2016.
- **The Allocations Development Plan Document** - this DPD will cover all other areas of the district outside of the 2 area action plans and will set out the approach to housing and employment development, the green belt, and the provision for sport and formal and informal recreational and open space. It will bring forward land allocations within the majority of the Bradford urban area, within the Principal Towns of Keighley, Ilkley and Bingley, together with the local growth centres and local service centres. Issues and Options stage consultation is scheduled for late 2014.

- 3.7 **The CS states (1.8) that Land will be allocated within the above three DPD's to meet the targets set out in this Core Strategy building on the currently unimplemented land supply. The DPD's will allocate sufficient land to ensure that there is at least a 5 year supply of deliverable sites. Deliverable sites will be those which are:**

- **Suitable:** are in suitable locations for development by reference to the LDF's policies and sustainability criteria and will help deliver mixed communities and successful vibrant places;
- **Available:** there are no land ownership constraints preventing delivery;
- **Achievable:** where there is a reasonable prospect that housing will be delivered on the site within the next 5 years.

This approach needs to be reflected in the “apportionment” of the housing numbers for each settlement. Trying to retrofit the deliverable sites to the prescribed targets brings into question the robustness of the CS. Can it be delivered, are there sufficient quality sites to deliver the housing numbers in acceptable locations?. The district wide target of 50% of new housing on brownfield land is an ambitious one which is based on the land supply data within the SHLAA.

4. A. Strategic Pattern of Development - Wharfedale

- 4.1 **In accordance with Policies H03 and EC3, Wharfedale will accommodate 1,600 dwellings and approximately 5 Ha of new employment land in the period up to 2030. The Council will work closely with partner organisations to ensure that this development is sensitively managed to create vibrant and sustainable communities. The broad distribution of housing development is shown as follows:**

Ilkley 800
Addingham 200
Burley In Wharfedale 200
Menston 400

- 4.2 Within Wharfedale **Burley in Wharfedale is recognised as a** desirable location and has seen good quality housing developments supported by shops and community facilities. The settlement has witnessed improvements to the environmental quality of the railway station and continue to benefit from high quality, fast and frequent rail and bus services to Ilkley and the major city centres of Bradford and Leeds.

5 CONCLUSION

- 5.1 I would proffer that Burley In Wharfedale should be promoted for further development, there being no reason to reduce its housing provision by some 318 units and it should be identified as a Local Growth Centre.

Askham

Otley
LS21