

Local Plan Group
City of Bradford Metropolitan District Council
2nd Floor South
Jacobs Well, Nelson Street
Bradford
BD1 5RW

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COMMENTS ON THE BRADFORD PUBLICATION DRAFT CORE STRATEGY

Introduction

We have now had the opportunity to read the Core Strategy Development Plan Document Publication Draft ("the Core Strategy") and its associated evidence base and we have a number of comments.

Examining Local Plans

Paragraph 182 of the NPPF outlines criteria which an independent inspector will use to assess the soundness of Local Plans. The key tests for assessing the soundness of a Local Plan are:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (our emphasis).

Our Representations/ Comments

Our representations and comments are on the following policies

- The Spatial Vision/Policy HO1
- Strategic Core Policy 4 (SC4): Hierarchy of Settlement
- Strategic Core Policy 5 (SC5): Location of Development
- Strategic Core Policy 7 (SC7): Green Belt
- Lack of Safeguarded Land Provision
- Sub Area Policy PN1: South Pennine Towns and Villages
- Policy HO1 /Table HO1: The Districts Housing Requirement

- Policy HO3: Distribution of Housing Development
- Policy HO4: Phasing the Release of Housing Sites
- Policy HO5: Density of Housing Schemes
- Policy HO6: Maximising the Use of Previously Developed Land
- Policy HO7: Housing Site Allocation Principles

The comments made in this letter relate to housing issues only and do not relate to retail or employment land considerations.

We will now comment on each of the above policies in turn:-

The Spatial Vision/Policy HO1

Paragraph 157 of the NPPF indicates that crucially, Local Plans should, amongst other matters be drawn up over an appropriate time scale, preferably a 15-year time horizon, taking account of longer term requirements, and be kept up to date.

We note that the Spatial Vision and Policy HO1 set out a plan period up to 2030.

We assume that the Core Strategy will be adopted towards the end of 2015; leaving a plan period of 15 years as required by the NPPF. However work on the Allocations Development Plan Document ('the Allocations DPD') will follow the adoption of the Core Strategy. A significant amount of work will be required to produce this document and work has not started yet.

We estimate that the Allocations DPD will not be adopted until 2017.

Conclusion

The Spatial Vision and Policy HO1 are **unsound** and conflict with national policy.

Recommendation

It is recommended that the plan period should run to 2032 to ensure that there is a minimum of 15 years from the adoption of all parts of the Development Plan and in particular the Allocations DPD.

Strategic Core Policy 4 (SC4): Hierarchy of Settlement

Policy SC4 sets out a coherent settlement hierarchy. The settlement hierarchy reflects the strategy contained in the RSS which had been the subject of public examination. We note that a new tier has been added into the settlement hierarchy, that of Local Growth Centres, and we specifically support the inclusion of these settlements and in particular Queensbury. We agree with the Core Strategy conclusion that these settlement are located on key public transportation corridors, have a range of services and facilities and are well connected to higher order settlements and therefore complement and support the role of these centres.

Conclusion

We support Policy SC4 and consider the settlement hierarchy to be **sound**. This policy has been positively prepared, it is justified and it will be effective.

Recommendation

No change

Strategic Core Policy 5 (SC5): Location of Development

This policy indicates that first priority in allocating sites in the Allocations DPD to the reuse of deliverable and developable previously developed land. This prioritisation of land is out of kilter with the NPPF.

The NPPF states at paragraph 111 that *'planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.'*

Many brownfield sites are within the settlement limits and cannot viably be delivered at this moment in time. Furthermore the previously developed land that exists tends to be clustered in certain areas. Prioritising development to previously developed sites will therefore concentrate development in particular areas. This will not provide a balanced portfolio of sites to meet the objectively assessed housing need. The Core Strategy approach is likely to continue to frustrate delivery.

Conclusion

Part 1 of the Policy is **unsound** as it is not consistent with national guidance.

Recommendation

Deletion of part A1 of the policy and amalgamate into part A2. Part 2 could read 'First priority to land within settlement limits'.

Strategic Core Policy 7 (SC7): Green Belt

Paragraph 83 of the NPPF states that *'local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'* (Our emphasis).

Paragraph 84 outlines the need for local planning authorities to take into account the need to promote sustainable development patterns whilst drawing up or reviewing Green Belt boundaries. Local planning authorities should consider the consequences for sustainable development in channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

Paragraph 85 sets out a number of guiding principles which local planning authorities should abide by when defining boundaries; these include:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;

- where necessary, identify in their plan areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Part 2 of Strategic Core Policy 7 states that Green Belt releases will be required to cater for longer term housing and jobs growth, Furthermore it suggests that there will only be a selective review of the Green Belt. There are two point here the first relates to whether Green Belt releases should only be for the delivery of longer term needs and second should any review only be selective.

In relation to the first point, it is appropriate to consider whether land in the Green Belt offers a more sustainable means of accommodating development than non-Green Belt alternatives. This is deemed particularly important when considering the quality of life of residents which may be compromised by the concentration of development that might arise from avoiding changes to Green Belt boundaries. Furthermore it is plain that if non-Green Belt land is incapable of accommodating the development needs or development would be more sustainable in a Green Belt location, then it is appropriate for the Core Strategy to include provision for changes to Green Belt boundaries to be made to allow for immediate development. In certain cases therefore development on Green Belt land may be more sustainable than other options. In addition to the above there may also be a need for a balanced portfolio of housing sites and therefore to properly meet the housing needs of the district the Core Strategy should not restrict Green Belt releases to the later phases of the plan but allow Green Belt sites to come forward as part of a range and choice of sites. A judgement will therefore need to be made as to what sites will best achieve sustainable development and to ensure that a range and choice of sites are provided throughout the district and this cannot be done if the policy explicitly prohibits this.

In relation to the second point from section 5.0 of the Core Strategy it is made clear that there is a need for significant Green Belt releases to meet the housing and employment needs of the district. To ensure that the most sustainable Green Belt releases are proposed it is essential that a comprehensive review of the Green Belt is undertaken. A selective review implies that the Council will only consider certain options or areas. This would be wrong and inappropriate.

Conclusion

We therefore support the general thrust of Strategic Core Policy 7 in that it is recognising that there needs to be Green Belt releases but we consider that the Green Belt releases should not be restricted to providing for the longer term development needs and that the review of the Green Belt boundaries should not be selective. The policy is therefore **unsound** in that it is considered that the approach is not justified and does not accord with the policies in the Framework.

Recommendation

Delete the words "longer term" and delete the word "selective" from part B.

Lack of Safeguarded Land Provision

As stated above, paragraph 85 of the NPPF sets out a number of guiding principles which local planning authorities should abide by when defining or reviewing Green Belts; these include:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The NPPF therefore confirms that the Green Belt, once defined or redefined, are intended to be permanent and the words *'they should be capable of enduring beyond the plan period'* clearly means that the Green Belt is intended to endure for longer than the Core Strategy plan period. It is normally recognised that a Green Belt, once defined or redefined, should endure for a period of at least 25 years.

It is plain from the Core Strategy that Bradford are proposing Green Belt amendments and that they are proposing to utilise the existing supply of safeguarded land to meet the current housing requirement. If we have read the Core Strategy correctly there would be no safeguarded land to provide for the future development need of the district to the end of the plan period (if the Council have got the housing requirement wrong) or to ensure that the Green Belt does not need to be amended at the end of the plan period.

The quantum of safeguarded land needed to ensure that the Green Belt does not need to be amended at the end of the plan period is of strategic importance and should have been considered as part of the Core Strategy. The lack of consideration of this matter is contrary to the guidance given in the NPPF.

For the avoidance of doubt, whilst it may be acceptable for the Council to identify individual safeguarded land allocations within the Sites Allocations DPD, the quantum of land needs to be agreed and set out in the Core Strategy. Again this is contrary to the NPPF.

Conclusion

We therefore strongly object to the lack of a safeguarded land policy and the lack of any consideration given to the quantum of land that might be required in order to ensure that the Green Belt, once redefined, does not need to be amended at the end of the plan period. The Core Strategy therefore has not been positively prepared as it will not meet the objectively assessed development needs for land in the future; there is no justification as to why there is no policy relating to Safeguarded Land or the quantum of such land that will be needed and as such the plan will not be effective in that the lack of a supply of such land will mean that there will almost certainly be a requirement to build in the Green Belt at the

end of the plan period or before. Furthermore, the lack of a supply of Safeguarded Land to ensure that the Green Belt does not need amending at the end of the plan period is contrary to the NPPF. The Core Strategy is therefore **unsound**.

Recommendation

There should be a safeguarded land policy within the Core Strategy and the Core Strategy should set out the quantum of safeguarded land required.

Sub Area Policy PN1: South Pennine Towns and Villages

We fully support this policy and in particular the identification of Queensbury as a Local Growth Centre and the proportion of growth being directed to it (see our comments under Policy HO1 /Table HO1 in relation to the housing requirement). It is appropriate to provide a range and choice of housing sites across the district and to support the sustainability low order settlement with additional growth. Queensbury is a relatively large settlement that benefits from a range of services and facilities and has an excellent bus and road connections to the City of Bradford and Halifax. There is also scope to extend the settlement without causing environmental harm, Queensbury is not in a flood risk area and there are no traffic problems. It is clear that it is appropriate to direct growth to Queensbury.

Conclusion

We support Sub Area Policy PN1: South Pennine Towns and Villages and in particular the identification of Queensbury. We consider the policy **sound**.

Recommendation

No change.

Policy HO1 /Table HO1: The Districts Housing Requirement

We support the recognition that the housing requirement is a minimum but we have a number of concerns. These are as follows:-

- Backlog in delivery
- Plan period
- Demolitions
- Vacancies
- Housing Requirement

Backlog in delivery

We welcome the recognition that the Council are seeking to make good the backlog in under delivery. In relation to this point we note from the housing trajectory that the Council are intending to make this backlog up towards the end of the plan period. To meet the unmet need this shortfall should be made up as soon as possible and within the first 5 years of the plan. This is one of the reasons why it may be necessary to release a wide range of deliverable and attractive sites including Green Belt land early in the plan period in order to boost the delivery of new dwellings.

Plan Period

We have already commented on this above.

Demolitions

Paragraph 5.3.18 refers to there being uncertainty in the level of clearance. We have reviewed numerous Core Strategies and Local Plans and never have we witnessed such a statement from an authority. The Council must have an indication of clearance levels from either historic trends or future projects. Even if there is some uncertainty an allowance should be made.

Vacancies

Vacant units already form part of the housing land supply and are part of the natural churn of the market. Without such units the market would not function. It would therefore be wrong to argue that the bring back into use of these units will reduce the housing requirement.

If the Inspector does not accept the above it is material to mention that the Council have an ambitious, indeed overly ambitious, target to bring back into use 3,000 dwellings. We have not been able to find evidence about how the Council are going to achieve this. The Core Strategy indicates that measures will be set out in other document but it is imperative that these measures are set out now so that they can be tested and scrutinised as part of the Core Strategy Examination.

Housing Requirement

The Core Strategy seeks to justify its housing requirement by reference to a report by edge analytics. This report essentially models two scenarios; one based on the rebased 2010 SNPP projections and the second on an employment led scenario. It concludes that the housing requirement should be between 2210 and 2565 dwellings per annum. We would have expected to see more scenarios modelled.

Before we continue on this topic we note that the SNPP figure is 490 dwellings per annum less than the former RSS figure of 2700 dwellings per annum and the Employment Led scenario, whilst closer, is still 135 dwellings per annum less than the previous RSS level. Given the historic shortfall in housing construction and the recession, which has further decreased the number of houses built, all of which has exacerbated the housing need, the Councils housing need requirement would seem to be at odds with the previously known picture.

The RSS requirement set out a projection of the housing need at a time of growth. Over the long term we would expect to be back on a pattern of growth. Indeed market information would strongly suggest that we have now returned to a period of growth. We are therefore surprised that the Core Strategy adopts a housing requirement significantly lower than the RSS figure.

The report by edge analytics strongly advocates the need to adopt the outputs from the Employment Led scenario of 2565 dwellings per annum (paragraph 7.13) but the Core Strategy adopts the figure closer of the rebased SNPP figure. The Core Strategy has therefore not followed the preferred approach of its own evidence base.

The Core Strategy itself indicates at paragraph 5.3.13 that it is simply taking a mid-point in the ranges modelled. The Core Strategy does not justify this approach. Using the SNPP model appears not to reflect the Councils ambitions with regard to employment growth. We would concur with the Councils own independent advisors that it is more appropriate to use the employment led growth projections.

The models used in the Core Strategy are essential trend based and these trends reflect the historic undersupply, the recessionary impacts and the lack of mortgage availability all of which have depressed the housing requirement. Consequently it is considered that the Core Strategy housing requirement is not an objective assessment of the true housing need. It is a picture of a depressed need.

As an indication of what we consider to be the true housing requirement to be we have reviewed the 'What Homes Where' toolkit. This toolkit identifies a need for 48,845 net dwellings over the plan period (2013 to 2030). This equates to 2,873 dwellings per annum in Bradford District which is significantly more than 2210; the level proposed by the Core Strategy.

Conclusion

There are serious omissions in the housing requirement calculation and the housing requirement is not justified by the evidence base and does not reflect the objectively assessed need and therefore the Core Strategy has not been positively prepared. Policy HO1 and Table HO1 are **unsound**.

Recommendation

Policy HO1 and Table HO1 should be amended to properly meet the objectively assessed housing need.

Policy HO3: Distribution of Housing Development

The policy sets out a clear distribution of the housing requirement. This is supported.

We are however unconvinced that all of the areas identified can deliver the units proposed particularly Inner Bradford and Keighley where house prices are low. If evidence is produced which questions the ability to deliver housing in these areas then other areas will have to accommodate additional growth.

Notwithstanding the above, and as already mentioned, we support the general spread of growth which ensures that all areas of the district and the majority of sustainable settlements will benefit from some housing growth catering for need where it arises and providing a range and choice of locations to build new houses. This is good planning practice. In particular we wholly support growth being directed to Local Growth Centres and the proportion of growth, subject to our comments in relation to Policy HO1 /Table HO1, to the settlements within this tier.

Conclusion

Overall it is considered, subject to our comments in relation to Policy HO1 /Table HO1 and further information about the capacity of certain areas to accommodate significant growth, that this policy represents a robust and justified apportionment of the housing requirement. On this bases the policy is considered to be justified and effective and is therefore **sound**.

Recommendation

No change to the proportionate distribution of the housing requirement subject to our comments in relation to Policy HO1 /Table HO1 and further information about the capacity of certain areas to accommodate significant growth.

Policy HO4: Phasing the Release of Housing Sites

We object to Policy HO4 part C. Part C indicates that the Site Allocations DPD will set out the phases for the delivery of the sites allocated for housing and a mechanism for the release of land subject to various matters, including the need to maintain a 5 year housing land supply, the need to ensure regeneration and the need to meet the targets for the development of brownfield land.

The NPPF does not suggest that plans should include a phasing policy. However it does require a Council to maintain a 5 year housing land supply. It is unclear how holding back sites will contribute to rectifying the current deficiency in the 5 year housing land supply or meeting the future 5 year housing land supply. The policy gives no indication how it will address the tension between the desire not to undermine the delivery of various regeneration projects and the requirement to maintain a 5 year housing land supply. The policy does not specify the trigger mechanisms but devolves this to the subsequent plans. This is considered inappropriate.

Conclusion

Without the detail that would normally accompany such a policy it is difficult to comment but on the basis of the information contained within the policy it is considered that the policy will be ineffective and unjustified and therefore **unsound**.

Recommendation

Unless greater detail on how this policy will operate is provided it is recommended that the policy should be deleted.

Policy HO5: Density of Housing Schemes

We object to the requirement to achieve "at least a minimum of 30 dwellings per hectare". It is our recent experience that house builders are building at densities between 20 and 35 dwellings per hectare. Furthermore there will be situation, often in smaller settlements, when the character of an area dictates a particular density of development or there is an overriding need to provide open space or surface attention of water which means that achieving the minimum density would be inappropriate or it simply cannot be achieved. In order to provide flexibility the policy should be modified to allow for these situations.

Conclusion

The policy as it stands is not justified and will be ineffective and therefore it is **unsound**.

Recommendation

Policy HO5 criterion B should be amended to read "sites should normally be built at a density of 30 dwellings per hectare but there will be circumstance, such as in locations close to a major public transport corridor or in a town or the city centre when higher densities would be appropriate and similarly in smaller settlement and where the character of the adjoining area dictates a low density would be appropriate".

Policy HO6: Maximising the Use of Previously Developed Land

We recognise the desirability of regenerating brownfield sites and to make effective use of land that has been previously development. This is sound planning policy.

Paragraph 111 of the NPPF encourages the effective use of land by re-using land that has been previously developed, provided that it is not of high environmental value and it does indicate that Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. It is therefore appropriate for a council to have a policy on the delivery of development on brownfield land.

However any locally set targets must be deliverable and based on evidence. We note that the Core Strategy suggests that they have interrogated the SHLAA to arrive at the settlement hierarchy derived targets. This is a good starting point but given the importance of this policy we would have expected to see a more robust evidence base such a report we tests the viability of delivery against certain assumptions and bench marks.

In addition to the above the policy also states that priority will be given to the development of previously development land. This is out of kilter with the NPPF for the reasons already set out.

Notwithstanding the lack of a robust evidence base to justify the targets sought the policy is so onerous and complicated that it is unworkable. It is unclear how the policy fits into the overall monitor position e.g. it is unclear what action would occur if failure to comply with this policy, on any of its limbs, happened. For example would it result in holding back consent on greenfield sites. Furthermore, and in addition to the above, would a breach of this policy occur if it happened in a single year or does it need to be a pattern over multiple years. The policy is unclear as to when and how it would be triggered and what actions would occur as a consequence.

Conclusion

Given the lack of evidence the policy is not justified, it sets out onerous targets and lack of clarity and as a result it will be ineffective and it conflicts with the NPPF. The policy is therefore **unsound**.

Recommendation

Additional evidence needs to be provided and the policy needs to be reworded to ensure that compliance can be achieved and so that anyone wanting to understand the situation can have a clear appreciation of the implications of any non-compliance.

Policy HO7: Housing Site Allocation Principles

We welcome the inclusion of a detailed policy to guide the allocation of sites. However we object to criterion B and C. Criteria B and C implies that that a range and choice of housing sites to meet the districts housing needs will not be provided. This would result in unmet demand. Furthermore criterion C seeks to prioritise the development of previously developed land, which as we have mentioned before, would be contrary to the NPPF.

We also believe that it would be beneficial to the clarity of the policy if the policy could make it clear that not all criterion under, for example, sub section F need to be satisfied.

Conclusion

As drafted the policy would result in ineffective delivery and it would not be consistent with the NPPF. It is therefore **unsound**.

Recommendation

Part B of the policy should be reworded to state that "a balanced portfolio of sites throughout the district to meet the objectively assessed housing need will be provided". Part C of the Policy should be deleted.

We trust that the above comments will be taken into account and we look forward to hearing from you.

Yours faithfully

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