

**Bradford Local Plan Core Strategy:
Representation from Bradford Council Conservative Group**

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Context

The Conservative Group submitted amendments to the proposed Local Plan Core Strategy for Bradford when it was considered by full council in December 2013. Many of these amendments were accepted by Council and are incorporated in the Local Plan Core Strategy.

However the Conservative Group still has concerns about the Core Strategy. These cover the following areas:

1. Housing numbers
2. The Viability of housing development in the City
3. Impact of the Core Strategy on regeneration
4. Green Belt
5. Transport infrastructure

All of these concerns relate to housing delivery since the transport infrastructure concerns derive from the capacity of existing networks to take further development without new infrastructure.

Housing Numbers

The Core Strategy anticipates (Policy HO1) that:

“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.”

This assessment derives from work undertaken to establish housing needs (Housing Requirement Study, GVA 2013) and links back to the Council’s Strategic Housing Land Availability Assessment (SHLAA) as well as the Strategic Housing Market Assessment (SHMA).

The Conservative Group’s concerns relate to:

1. The inadequacy of land supply within the SHLAA
2. Not meeting the actual needs identified in the Housing Requirement Study

In the case of the SHLAA it is realistic to assume that not all the sites it considers are suitable for housing. Given that the SHLAA has land available for only 52,000 homes and the Local Plan requirement is for at least 42,100, there is a significant risk that insufficient land exists to meet the stated

housing requirement at the densities proposed in the Core Strategy (once other planning constraints and considerations are taken into account).

It could be possible to identify land that is not within the SHLAA but this would (assuming the land is not under the Council's control) raise further questions about viability since the sites were not submitted for consideration in response to the Council's call for submissions to the SHLAA.

Given this constraint and the lack of available land it would seem reasonable to reduce the housing numbers by 3,000 so as to reduce the pressure on the SHLAA. In addition consideration should be given to 'densification' especially on sites within the City of Bradford and on sites close to the centres of town and villages or near to public transport hubs.

The Housing Requirement Study anticipates an increase in population to 595,799 by 2028 driven mainly by natural growth (Core Strategy 2.32). Much of this natural increase will be within the 'City of Bradford including Shipley & Lower Baildon' rather than within the other areas identified within the plan. This is indicated in 2.32 of the plan:

"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."

Given this skewed distribution you would expect the Core Strategy to allocate housing in a similar manner. However the Core Strategy does not do this (Core Strategy 5.2.48):

"The District wide housing requirement of 42,100 was then assigned according to the proportion of the population within each settlement."

Some adjustment is made to this distribution but too great an emphasis is given to housing development in areas of the District where rapid population growth is not anticipated (in particular the places designated as Local Growth Areas – Queensbury, Thornton, Silsden and Steeton-with-Eastburn).

The risk with the proposed approach is that development in Airedale and Wharfedale will not meet housing needs within the District but rather housing demand from the City of Leeds, North Yorkshire and Calderdale especially given current transport and travel-to-work patterns.

Bradford Council Conservative Group argue that:

- 1. Housing numbers within the Local Plan Core Strategy do not reflect the reality of land availability within the District and should be reduced by at least 3,000 (assuming increases in development density can meet a further 3,000 homes within the City of Bradford including Shipley & Lower Baildon)**
- 2. The distribution of proposed housing does not reflect the spatial distribution of population growth in the Bradford District and could fail to meet the needs of a growing young, BME population within the City of Bradford**
- 3. The focus on development in Airedale and Wharfedale could serve merely to meet housing demand in Leeds and North Yorkshire rather than housing need in Bradford, Similarly housing demand from Calderdale rather than Bradford's housing need would be served by the focus on development in Queensbury and Thornton**

Viability of housing development within the City of Bradford

The Local Plan Core Strategy is clear that there are risks associated with viability and this is supported by the Local Plan Viability Assessment which, as is set out at 6.1.4:

"...indicates that the viability of development varies across the District and that there are viability challenges associated with delivering development in some areas of the District."

The Core Strategy seeks to address this problem through Policy ID2 which allows for viability assessments and consideration of individual scheme viability. This policy draws on national guidance and the RICS Guidance Note on Financial Viability in Planning. Our concern is that, even with these provisions and a suitably flexible approach to the management of planning applications, many sites within the City of Bradford remain unviable without subsidy.

In addition, we can expect that any Community Infrastructure Levy for development within the City of Bradford will be at or close to zero further limiting the scope for developing affordable housing on less viable sites. Although there will be grant funding for social and affordable housing through national schemes reliance on these sources to meet housing need raises further questions about the Local Plan's viability.

Current housing values in Bradford (Right Move <http://www.rightmove.co.uk/house-prices/Bradford.html> accessed 17 Mar 2014) are estimated at £112,700 for a semi-detached property. While this figure will vary across the City of Bradford it indicates that, even were land prices close to zero, commercial housing development is not viable.

If population growth proceeds as estimated in the Housing Requirements Study there may be increases in house prices and land values sufficient to make sites viable. However, without subsidy, few sites within the core of the City are currently viable or likely to become viable in the near future.

It is worth noting that significant sites with planning permission (e.g. at two former mill sites in Denholme) remain undeveloped because housebuilders do not see them as viable. As a result we can expect developers to prioritise development locations that are viable and that these locations are likely to meet housing demand from Leeds and North Yorkshire rather than housing needs within Bradford

Bradford Council Conservative Group argue that:

- 1. At current development costs and housing sale values development is not viable across much of the City of Bradford**
- 2. Policy ID2 is not sufficient to address this lack of viability**

Impact of the Local Plan Core Strategy on regeneration

The Council is clear that regeneration remains a leading priority and especially the regeneration of the City Centre and inner suburbs. This is reflected in key documents such as the Community Strategy and underpins strategies for delivering the spatial vision of the Local Plan as stated in 3.5 and 3.8:

“This transformation has been symbolised by the regenerated City Centre, with a city park and a thriving commercial and residential community.”

And:

“The majority of these new homes have been located in and around the City of Bradford, where emphasis has been successfully placed upon regenerating existing urban areas, the recycling of brownfield land and the expansion on the urban area in sustainable locations.”

As we have already noted, there are doubts about the viability of this strategy given the lack of housing demand and low house prices within the City of Bradford.

However, this problem is compounded by the lack of a regeneration element within the Local Plan Core Strategy. No attempt is made to shape policy so as to deliver regeneration within 'existing urban areas' and particularly in those inner urban areas critical to the delivery of the aspirations within the broad spatial vision.

We have noted our concerns that the identification of greenfield sites in Airedale, Wharfedale, Queensbury and Thornton are as likely to meet housing demand from Leeds, North Yorkshire and/or Calderdale as housing need within the City of Bradford.

Given the lack of viability for sites in the inner city, even allowing for the planning flexibility of Policy ID2, it would seem sensible to look at whether development of new Greenfield sites can be directly linked to the regeneration of brownfield sites elsewhere.

The Council has not attempted to address this problem in the Local Plan Core Strategy and there are no proposals in the new Housing and Homelessness Strategy to make use of CIL or New Homes Bonus to bring forward brownfield sites within the City of Bradford.

Bradford Council Conservative Group argue that:

- 1. Specific policies are required to support the regeneration of currently unviable brownfield sites**
- 2. The release of Greenfield sites must be linked to the delivery of regeneration within the inner city**

Green Belt

Nearly all the land outside Bradford's main urban areas sits within the West Yorkshire Green Belt. The National Planning Policy Framework sets out the purpose of the Green Belt:

"Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;*
- to prevent neighbouring towns merging into one another;*
- to assist in safeguarding the countryside from encroachment;*
- to preserve the setting and special character of historic towns; and*

- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Within Bradford's Local Plan there is a clear intention to preserve the Green Belt substantially as it is under current (rUDP) planning strategy. However, the intention is to review this Green Belt only where the HO3 target for each identified settlement cannot be met using land not in the Green Belt. For most of the Local Service Centres identified within the Local Plan Core Strategy there will be a need for Green Belt release in order to meet HO3 targets.

We have noted the recent exchange of correspondence relating to Green Belt policies between the Planning Minister and the Planning Inspectorate.

*"Alongside these reforms we were always very clear that we would maintain key protections for the countryside and, in particular, for the Green Belt. The National Planning Policy Framework met this commitment in full. The Framework makes clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt. The special role of Green Belt is also recognised in the framing on the presumption in favour of sustainable development, which sets out that authorities should meet objectively assessed needs **unless** specific policies in the Framework indicate development should be restricted."*

Although the Minister makes clear that this does not represent any change in policy and that local planning authorities can review Green Belt boundaries, the Bradford Local Plan Core Strategy does not indicate the basis on which any review of these boundaries might be conducted other than to meet HO3 targets. As the minister makes clear, amendments to Green Belt boundaries require "exceptional circumstances". There is some doubt that the approach adopted by Bradford sets out what these exceptional circumstances might be (especially in the context of the issues we have raised around the spatial distribution within HO3 and the viability of development within the City of Bradford).

The NPPF policy is very clear that Green Belts are needed to encourage the better use of land within urban areas and especially previously developed land. Bradford's Local Plan Core Strategy does not seek to use the potential need for Green Belt releases as a trigger for supporting regeneration and the recycling of brownfield land.

Bradford Council Conservative Group argue that:

- 1. Proposals for Green Belt releases are unclear and fail to set out the 'exceptional circumstances' needed to justify a release**
- 2. Policies in HO3 do not set out the basis for any local review of the Green Belt especially in areas of environmental or historical sensitivity**
- 3. Specific policies are needed so as to meet NPPF policy on Green Belt reviews**

Transport Infrastructure

Proposed policies within the 'Transport and Movement' section of Bradford's Local Plan Core Strategy draw initially on the third West Yorkshire Local Transport Plan 2011-2026 (the LTP). This plan sets out to:

- 1. Improve connectivity to support economic activity and growth in West Yorkshire and the Leeds City Region*
- 2. To make substantial progress towards a low carbon, sustainable transport system in West Yorkshire, while recognising transport's contribution to national carbon reduction plans*
- 3. To enhance the quality of life of people living in, working in and visiting West Yorkshire*

These policies suggest that future development should be focused, at least to a significant degree, on meeting the aspiration in 5.1.63 of the Core Strategy:

"A key aim of the integrated land use and transport planning policies is to reduce the need to travel and to reduce the length and number of journeys, particularly those made by private car and road freight."

The housing policies set out in HO3 do not meet this aspiration even within the main "City of Bradford including Shipley and Lower Baildon" urban area. Perhaps 50% of the housing requirement in HO3 is proposed for areas remote from high quality public transport networks and from local services.

Transport policies (as the LTP sets out) are also critical to the future economic development of the Bradford District. The Core Strategy makes no policies that relate directly to the development of the local economy.

Bradford Council Conservative Group argue that:

- 1. Specific links between the proposals for housing in HO3 and investment in transport infrastructure is needed so the sustainability element of Policy P1 is met**
- 2. Priority should be given to sites that meet the aspiration for more sustainable, lower carbon transport**
- 3. The impact of transport links on the economy and economic growth needs recognition and, if appropriate, policies so as to support the ambition of the Local Transport Plan**