

# Representation to Bradford City Council Core Strategy DPD Publication Draft on behalf of ██████ Kemp



## Introduction

WYG has been instructed by Mr ██████ Kemp to make a representation to the Bradford City Council Core Strategy DPD Publication Draft. Mr Kemp owns land on Lady Lady, Bingley.

The land in question lies within the curtilage of Mr Kemp's residential property and is within the designated Green Belt. The most recent SHLAA identifies the site as "amber" confirming it has the potential to deliver 25 homes, but is constrained by policy. Whilst it is not explicit within the SHLAA, we understand that the current Green Belt is the policy constraint being referred to.

The site is in a sustainable location within an established and developed area of Bingley, a Principal Town, which is a focus for future development. The site benefits from good access to services and facilities. It can be sensitively developed. The site currently does not meet the purposes of Green Belt Policy and the SHLAA should be updated to reflect the residential development potential of the land, particularly given the need for reviewing Green Belt boundaries is established in the Core Strategy.

## Representation

We make the following representations on behalf of Mr Kemp:

### Policy P1: Presumption in Favour of Sustainable Development

This policy has been added since the last consultation of the Core Strategy DPD and reflects the main aim and objective of the National Planning Policy Framework (NPPF). We therefore **support** the inclusion of this Policy in the Publication Draft.

### Policy SC4: Hierarchy of Settlements

We support Bingley as a Principal Town within the Settlement Hierarchy. We further **support** the aim to make Bingley an accessible and vibrant place to live, work and invest.

### Policy SC5: Location of Development

We recommend that criteria (1) is **redrafted**. It currently reads: "*First priority to the re-use of deliverable and developable previously developed land and buildings provided that it is not of high environmental value and more efficient and effective use of existing developed areas within the City of Bradford, Principal Towns or Ilkley, Keighley and Bingley, the Local Growth Centres and Local Service Centres*".

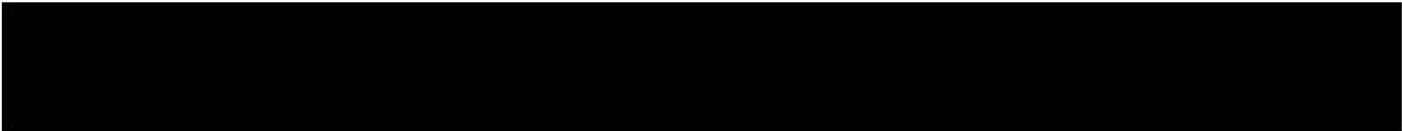
It may be clearer to state: "*First priority will be for the re-use of previously developed land and buildings, subject to material considerations, within the City of Bradford, Principal Towns of Ilkley, Keighley and Bingley, the Local Growth Centres and Local Service Centres*".

Criteria (3) currently reads "*Third Priority to Local Green Belt releases to the built up areas of settlements in sustainable locations*"

We would also recommend that criteria (3) is **reworded** to read: "*Third priority to Local Green Belt releases in the built up areas of settlements in sustainable locations and where it would not prejudice Green Belt purposes*". This would more accurately reflect the NPPF.

### Policy SC7: Green Belt

We **support** the selective review of the Green Belt to deliver housing growth throughout the Plan Period. We recognise that the Site Allocations DPD will identify the most appropriate sites to release.





### **Policy HO2: Strategic Sources of Housing Supply**

Part (B.3) of Policy HO2 currently reads *"Local Green Belt releases where consistent with the Plan's sustainability principles, and where other sources of supply have provided insufficient within the relevant settlement or strategic planning sub area"*. We consider that the latter part of this criteria is superfluous and the policy should be **amended** to read *"Local Green Belt releases where consistent with the Plan's sustainability principles."*

In addition to the comments relating to Policy HO2 specifically, it is also noted that whilst there are several references to the need for a Green Belt review to deliver housing, the Core Strategy Publication Draft is silent on the strategy for undertaking such a review. Given the significant number of new homes that the Council has identified will need to come from Green Belt releases, it is considered that there should be a clear and coherent strategy set out in the Core Strategy which sets out a framework for undertaking the review. This should accord with the hierarchy of settlements, as set out in SC4 whereby higher order settlements, such as Principal Towns, should be considered first as these settlements, by their very nature, offer more sustainable locations for new housing.

### **Policy HO3: Distribution of Housing Development**

With reference to Part (B) we note that 6,700 new homes are due to be delivered in the District's 3 Principal Towns. We **query** why some 67% of these homes are to be directed towards Keighley and only 21% is suggested for Bingley. We would suggest that this presents an unbalanced picture when considered within the context of the Settlement Hierarchy (Policy SC4) and maintain that a larger proportion of new homes should be considered for Bingley. As a Principal Town, the Council recognises that it is a sustainable settlement for growth and it therefore follows that it should accommodate a higher number of new homes than Policy HO3 currently suggests.

### **Policy HO6: Maximising the Use of Previously Developed Land**

We **support** this policy which suggests that 50% of new housing within Principal Towns should be delivered on Previously Developed Land. This is especially relevant given our comments relating to Policy HO3, suggesting that Bingley, as a Principal Town, should take a larger share of the 6,700 new homes that are to be delivered in the 3 Principal Towns over the Plan Period.

### **Policy HO7: Housing Site Allocation Principles**

Part (A) refers to the need to allocate sufficient deliverable and developable sites to meet the targets set out in Policies HO1 and HO3. In line with our previous comments, we consider that Part (A) is **amended** and also includes for the provision to undertake a Green Belt review so as to ensure that land which is currently designated as Green Belt, in sustainable locations, well connected to the settlements and which, if removed, would not prejudice Green Belt purposes, is considered when allocating housing sites. Part (A) should therefore read:

*"The need to allocate sufficient deliverable and developable sites, including from Local Green Belt releases, to meet the targets set out in the Core Strategy Policies HO1 and HO3"*.

Part (E) of Draft Policy HO7 should also be **amended** to reflect that Green Belt land will be released to deliver some 11,000 homes across the Plan Period. It should also be stated in the Policy that in some circumstances the release of Green Belt land may offer the most sustainable and deliverable option to meet housing needs. This is especially relevant in circumstances where land within the Green Belt falls within the definition of Previously Developed Land which the Council seeks to maximise through Policy HO6.

