
Representations to Bradford Metropolitan District Council's Core Strategy Development Plan Document (Publication Draft)

On Behalf of Chartford Homes

March 2014

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Core Strategy Development Plan Document (Publication Draft)**

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1.0 Introduction

- 1.1 Barton Willmore is instructed by Chartford Homes (hereafter referred to as the 'Client') to submit representations to the publication draft of Bradford Metropolitan District Council's Core Strategy Development Plan Document ("CSDPD") which is currently subject to public consultation until 31st March 2014.
- 1.2 As a landowner and house builder within West Yorkshire, our Client represents a key stakeholder in the District. As such, our Client has a keen interest in the development of Bradford and its wider District through the plan-making process and therefore welcomes the opportunity to respond to the publication draft of the CSDPD.
- 1.3 Our Client's interests within the district lie within Addingham and whilst generic comments to the plan are made, specific reference to Addingham is also included in the context of both general policies and policies concerning the Wharfedale sub area.
- 1.4 These representations set out a number of issues in relation to the CSDPD that our Client believes should be addressed in order to achieve a sound document through an examination by an independent Planning Inspector. The representations refer to the tests of soundness established in paragraph 182 of the National Planning Policy Framework ("the Framework"); most notably that the policies contained in the CSDPD need to be justified, effective, consistent with national planning policy (contained within the Framework) and positively prepared. Reference is also made, where relevant to the recently published National Planning Practice Guidance ("PPG") which seeks to provide further explanation to the policies within the Framework.
- 1.5 These representations are primarily based upon the policies and text within the CSDPD whilst referencing the supporting documents contained in the Evidence base produced by BMDC.

2.0 Comments on the Soundness of the Core Strategy

Overview of the Core Strategy Development Plan Document

- 2.1 Whilst our Client recognises the need to have an up to date development plan in place it is considered that the appropriate development plan is carefully considered and that the policies within CSDPD are sufficiently robust, comprehensive and sound.
- 2.2 Our Client's primary concern is the way in which many of the CSDPD's policies (including, but not limited to, Policies SC4, SC5, SC7, WD1, WD2, H01, H03, H04, H05, H07, H011, SO2, SO7) can only be effectively implemented once other allocating/detailed development plan documents have been adopted by the Council. These detailed/allocating development plan documents appear some way off adoption.
- 2.3 In particular our Client has concerns relating to the following sections:
- Section 3 – The Spatial vision, Objectives and Core Policies;
 - Section 4 – Sub-area policies with reference to Wharfedale;
 - Section 5 - Thematic Policies, with specific reference to housing and the Green Belt.

Section 3 – The Spatial Vision, Objectives and Core Policies

Strategic Objectives

- 2.4 Our Client notes the strategic objectives listed in paragraph 3.15 of the CSDPD, particularly the reference to the recognition to fully exploiting the area of Wharfedale as a dynamic location of choice for housing. Whilst this objective is fully supported it is considered, as will be demonstrated in these representations, that the policies contained in the CSDPD do not provide the necessary policy basis to ensure that this can be delivered.
- 2.5 Our Client also supports the Council's aims to locate development in sustainable locations, however **objects** to the reference to prioritising the use of previously developed land, which is contrary to the policies contained in the Framework. This strategic objective is considered to be contrary to national guidance and recurs throughout the CSDPD on both a district and localised level.
- 2.6 **Strategic Core Policy 4 (SC4)** identifies the hierarchy of settlements providing guidance for future growth. Following consultation on earlier versions of the CSDPD the guidance on

Local Service Centres and Rural Areas are combined and have been redrafted to include that the 'emphasis will be on smaller scale developments which meet local needs.' Our client **objects** to this redrafting as unsound on the basis that restricting development to provide an emphasis to small scale developments is not planning positively, as required by the Framework. The policy does not preclude larger scale developments and there is no policy justification to support a maximum level of development within these areas. It is therefore considered that the emphasis should not be placed on smaller scale developments, as this could preclude the most appropriate sites being brought forward through the later Allocations DPD.

- 2.7 The supporting text to the policy in paragraph 3.75 references that a 'much slower pace and scale of growth...forms the overall approach in these parts of the district' (including Addingham). Given that many of these settlements, including Addingham have been stifled by policy restrictions in recent years there is a clear need for housing now. It is inappropriate to restrict meeting this need, particularly by reducing the pace that this delivery can occur. An identified need is in place at present and needs to be met at present, rather than delayed until later in the plan period.
- 2.8 **Strategic Core Policy 5 (SC5)** Location of development maintains the Councils approach to prioritising previously developed land. Whilst it is considered that previously developed land should be encouraged it has to be deliverable. Given the viability issues associated with some previously developed sites it is considered that sites must be demonstrated as deliverable in order to meet the full housing need. As such it is considered that each site should be assessed on its merits in accordance with the criteria established within section B of the report. Our Client **objects** to the policy as written and would recommend either the removal of part A or it is amended to clearly state that Part A demonstrates how land will be 'encouraged' to be developed rather than prioritised as currently drafted.
- 2.9 Whilst these comments relate to previously developed land Our Client supports the acknowledgement of meeting localised need by identifying large scale extensions as the lowest priority. It is necessary to meet identified needs in all settlements as opposed to providing one large area in an identified sub area, which would reduce identified needs in another. For example providing a large scale extension to Bradford at the expense of identified need in Wharfedale would be inappropriate. The need for organic growth of individual settlements needs to be considered and identified in the policies.
- 2.10 Strategic Core Policy 7 (SC7) provides three sub sections relating to future Green Belt release. Our Client **objects** to criteria B, which as drafted is considered to be unsound by

virtue of being contrary to the Framework and not positively prepared. Criteria B identifies that only a selective review of the Green Belt will take place, deferred to a later Allocations DPD. In the recent Examination in Public of the Leeds Core Strategy a similar issue was raised, whereby only a selective review was proposed. This in turn was considered contrary to policy and as such, recommended modifications from the Inspector detailed the need for a full review.

- 2.11 As identified on the key diagram, all but settlements in Wharfedale and Silsden are identified for a Green Belt review. Given the extensive areas identified for Green Belt review it is tantamount to a full review but with the exception of three settlements. There is no evidence to demonstrate why these settlements are excluded and to demonstrate that their housing need can be met without a Green Belt review. Given the tight boundary drawn around Addingham not having a Green Belt review prejudices the ability to provide the housing needs of the settlement by significantly limiting the opportunities for development to occur, potentially predetermining any sites to be included in the Allocations DPD.

Section 4 Sub Area Policies – Wharfedale

- 2.12 Section 4.3 identifies the proposed development levels and proposals for Wharfedale, the sub-area that includes Addingham. This sub-area has seen the majority of changes following consultation on the Core Strategy Further Engagement Draft, with significant reductions in the level of homes, the downgrading of settlements in the settlement hierarchy and the removal of a proposed Green Belt review.
- 2.13 As will be demonstrated in these representations this sub-area has received a disproportionate reduction in proposed development with no evidence to support this approach. The revised approach to Wharfedale in the Publication Draft is considered to be **unsound** as it conflicts with national policy and is not considered to be positively planned.
- 2.14 As context the SHMA identifies Wharfedale as a sub-area which has experienced a decrease in population over the period 2001-2007 and a noticeable outflow of residents aged 25-39, with an expectation that the population of older people (currently 28.4%) will increase. This is evidenced by a 17% increase between 2001-2007 of the number of people aged over 75. These figures identify a history of under delivery of new and affordable homes preventing choice in the market place and in turn having a detrimental impact upon facilities and services, such as schools, which in turn clearly demonstrates the need for future investment and growth.

- 2.15 This section of the CSDPD is based upon the policies and strategies contained elsewhere in the plan and brings them together to demonstrate the detailed impacts upon Wharfedale. In summary **Policy WD1** reduces the overall level of housing from 3100 homes planned to 2028 in the Further Engagement Draft to 1600 homes over an extended two year period in the Publication Draft. On a localised level the settlement of Addingham has thereafter been reduced to deliver 200 homes as opposed to the previous 400 homes proposed.
- 2.16 To put this into perspective, the differences between the two plan versions in terms of the overall housing target a reduction of 14%. Whereas in Wharfedale it is reduced by 51%, including a reduction in Ilkley from 1,300 to 800 and in Addingham 50%. It is clearly disproportionate to identify a 14% reduction in housing need across the district and thereafter equate this locally to a 50% reduction in need in Wharfedale.
- 2.17 The Hunston case is clear that the fully objectively assessed housing figure should be considered without consideration of any policy restrictions. This approach should be considered when considering the overall housing target but also when considering the need for individual sub areas.
- 2.18 It is noted that within Wharfedale, both the Green Belt and the Special Protection Area (SPA) buffer zone should not be considered when establishing the fully objectively assessed need for Addingham and Wharfedale. As drafted the disproportionate reduction is not considered to be positively planned and therefore Policy WD1 is **unsound**.
- 2.19 Notwithstanding this, **Policy WD1** is also considered to be unsound as it has also removed the need for a Green Belt review in Addingham to meet the local housing needs. Further to this Policy WD2 identifies the locations within the sub-area where a Green Belt review should take place, discounting Addingham. Whilst this is not the appropriate stage to promote sites the available and deliverable sites must be considered to ensure that the Councils proposal to retain the existing Green Belt boundary will enable the delivery of new homes.
- 2.20 The SHLAA forms part of the evidence base for the CSDPD and as such can be seen to justify the Councils position regarding Addingham to demonstrate that 200 homes can be delivered without a Green Belt release.
- 2.21 Only six sites exist within the SHLAA in Addingham not affected by the Green Belt. If all of these sites came forward and were developed to their maximum capacity, this would only deliver 255 homes over the plan period. Whilst this is above the 200 homes target it should be noted as a figure based on a delivery of 30dph on the gross areas of the sites. Two of

the sites have approximately 25% located within Flood Zone 3 (006 and 016) and others include significant tree coverage protected by TPO (011). Site 011 is also identified as a current housing allocation, which has not been delivered. Further inclusion would be questionable as there are clear deliverability issues.

- 2.22 More importantly however is an acknowledgement within the SHLAA assessment that in order to deliver sites 002 and 003, which jointly provide 88 homes, development would need to be carried out in accordance with the development of adjacent land, itself within the Green Belt. This is categorical evidence that without a Green Belt release the SHLAA only identifies sites capable of delivering 167 homes, should Policy WD1 as drafted be adopted. In addition to this is the clear question marks over a number of other sites within the SHLAA regarding their deliverability.
- 2.23 Whilst these statements are not intended to support or dismiss the merits of individual sites it clearly shows that the policy as drafted (even with the debated reduced figure) is not deliverable and a Green Belt review should not be categorically dismissed as this would, on the Councils own evidence, result in an undeliverable plan.
- 2.24 Policies WD1 and WD2 should therefore be amended as with Green Belt policies to reflect the need for a full review of Green Belt boundaries to include Addingham and to ensure that the necessary level of new homes can be delivered.

Section 5 – Thematic Policies

Housing

Housing Requirements

- 2.25 Again, whilst not part of the examination process, consideration should be given to the Further Engagement Draft and the reduction in overall housing provision by 14% and how this reduction has been distributed across the plan, with disproportionate reductions in particular to Wharfedale.
- 2.26 Within the CSDPD **Policy HO1** propose an overall average figure of 2,200 dwellings per annum plus addressing the backlog of 7,687 dwellings that has occurred since 2004. The overall figure also takes into account the re-occupation of 3,000 empty homes within the District (which in turn are deducted from the overall housing requirement).

- 2.27 The conclusions of this exercise result in a total net housing requirement of 42,100 dwellings over the plan period. Our Client objects to this figure, particularly with reference to the inclusion of 3000 empty homes which are considered to be brought back into use. However the Council have not provided robust evidence to demonstrate how these empty houses will be re-occupied and provide no policy to encourage this to occur. Without such evidence the inclusion of empty homes as a deduction to the housing requirements is **unsound** as it cannot be justified.
- 2.28 Further to this, whilst the Council make an estimate on empty homes being brought back into use, it makes no provision for the loss of housing stock during the plan period. This is noted in paragraph 5.3.19 and Sub Section C of Policy HO1, whereby it is acknowledged that through demolitions and change of use there will be a reduction in housing stock, however this is considered more appropriate to be left to the Allocations DPD to determine the exact level.
- 2.29 This approach is **unsound**. The Allocations DPD will provide for allocations in accordance with the level of housing established in the CSDPD. It is not for the Allocations DPD to identify a revised housing number to deliver in individual areas. The reduction in housing levels must therefore be included now otherwise there is the potential for it not to be included.
- 2.30 Further to this given the Allocations DPD is likely to be delivered within the next two years with consultation within one year on issues and options. It is therefore unclear what evidence will be available at that time, which is not available now.
- 2.31 The overall approach of 2,200 dwellings per annum does not appear to be linked to any specific demographic projection, the Strategic Housing Market Assessment (SHMA) or any modelled housing scenarios. Instead it appears to be a midway point between two modelled economic scenarios of the 2008-based and 2011-based sub national household projections (as required by the PPG in paragraph 15-20). On this basis alone the housing requirement cannot be justified.
- 2.32 In advance of identifying the housing requirement for the district, paragraph 5.3.13 identifies that the key conclusion of the Councils Housing Requirements Study identifies the need to see 'rapid and sustained population growth' and that the housing requirement 'should be aligned to a level of household growth consistent with the expected expansion in the district's economy as indicated in the Regional Econometric Model.'

- 2.33 'Policy EC2 of the CSDPD highlights that the Council's target is to create 2,897 jobs per annum, however the housing target propose would only support 1,600 jobs per annum. This would indicate that the housing numbers proposed would be insufficient to meet the Council's current economic aspirations and that the only way that the current proposed housing target and jobs target can be reconciled is to assume that unemployment within the District falls dramatically. This approach is entirely unrealistic, does not meet the aspirations established in paragraph 5.3.13 of the CSDPD and cannot be justified.
- 2.34 On the basis that the Framework seeks that local planning authorities need to 'boost significantly' the supply of housing land (paragraph 47) and to 'plan positively' (paragraph 14), it is our Client's view that to make Policy HO1 sound the Council need to re-examine housing requirements so they realistically can take into account the economic aspirations outlined in Policy EC2. This will require the Council to provide dwellings over and above the 2,200 dwellings per annum figure outlined in the CSDPD.

Distribution of Housing

- 2.35 Whilst our Client objects to the overall housing provision and specifically the unjustified disproportionate reduction in Wharfedale contained in Policies WD1 and WD2 further detail on the distribution of the number of dwellings proposed is outlined in a subsequent policy (Policy HO3).
- 2.36 The approach in **Policy HO3** is to provide a broad indication of the distribution of dwellings within Bradford's District with further details to be provided in subsequent allocating/detailed development plan documents.
- 2.37 Within the CSDPD the Council have observed the requirement within each settlement based on expected population changes over the plan period, using 2011-based census and GIS software. The Council have then adjusted these figures to take into account various factors. These include:
- Land supply (principally the evidence provided in the Strategic Housing Land Availability Assessment ('SHLAA'));
 - Growth Study;
 - HRA and South Pennine Moors Birds and Habitats Surveys;
 - Flood Risk; and
 - Other factors (including maximising previously developed land/minimising Green Belt release/delivering affordable housing).

- 2.38 The effect of this is outlined in tables HO3 - HO7 of the CSDPD where overall there is a noticeable boost in housing numbers in areas such as Bradford City Centre, Shipley and Canal Road Corridor, South East Bradford and Keighley. This appears to be at the expense of settlements such as Addingham, areas of Bradford outside of the south east and many of the Local Service Centres where housing is proposed to be constrained to a level below the identified need based on population.
- 2.39 Whilst our Client does not object in principle to the need to provide a broad range of distribution to various settlements within the Bradford and its District, this should apply equally to all settlements based on local need. It believes the Council's methodology and approach to the distribution of housing in Policy HO3 is flawed and **unsound**.
- 2.40 In determining the proposed distribution of dwellings across the District, the Council have placed a strong emphasis on the Growth Study, a document produced to examine areas in and around settlements that are subject to constraints. This however appears to largely ignore important factors such as viability considerations, deliverability of available sites and most importantly the growth needs to maintain viability of a settlement and also to meet the needs of population changes in those settlements.
- 2.41 The results of this further assessment have resulted in the CSDPD making significant changes to the Wharfedale sub-area, whereby the overall housing level has been halved, two settlements previously identified as Local Growth Centres have been downgraded to Local Service Centres and the acknowledgement that to meet identified need a Green Belt review will be required has been deleted.
- 2.42 Without proper consideration of need and viability it will be difficult for the Council to undertake their desired distribution of housing given many lower value areas of the District and certain previously developed sites will not be able to be delivered in the current market. This in turn this will unduly affect the Council's ability to achieve its overall housing target. As a result of this it is our Client's view that on this basis the policy will be ineffective.
- 2.43 Having considered the Growth Study it appears that the primary evidence for making the reductions to development in Wharfedale is based upon the impact of Special Protection Areas ('SPA') and Special Areas of Conservation ('SAC') in relation to settlements in the District. The approach taken and outlined in the Council's Habitats Regulation Assessment is to create a 2.5km buffer zone around the SCA/SPA boundary, which in turn has informed Policy HO3. This approach has led to the direct result of reducing development within Wharfedale and particularly Addingham.

2.44 Whilst our Client acknowledges that there is a requirement to ensure key areas of wildlife are given the necessary protection, a 2.5km buffer zone is considered overly cautious and in employing such a wide buffer has the effect of unnecessarily constraining growth within certain areas of Wharfedale and Airedale where there is a clear identified need for housing. Continuing with this approach will therefore create imbalances within the housing market and unsustainable patterns of development.

2.45 It is noted that the buffer incorporates all SHLAA sites within Addingham and if applied as an exclusion zone would remove all development opportunities. This is clearly not the purpose of the buffer zone, as demonstrated by the proposed 200 new homes. Given the 200 homes proposed and the acknowledgement that the buffer zone does not preclude development in its entirety it does not provide any tangible evidence to support a 50% reduction from 400 to 200 homes within Addingham.

2.46 Table 2.1 below identifies the differences from the previous consultation draft of the CSDPD. Again, whilst it is agreed that the previous draft is not for examination, this table demonstrates that the settlements in Wharfedale have been disproportionately reduced in their delivery levels, despite no evidence of a lesser housing need.

Table 2.1: Changes to the Level of Proposed Homes in Local Service Centres

	SCDPD Further Engagement Draft	CSDPD Publication Draft	Difference in new homes	Percentage difference
Overall	48,481	42,100	6,381	-14%
Addingham	400	200	200	-50%
Burley in Wharfedale	500	200	300	-60%
Baildon	550	450	100	-19%
Cottingley	300	200	100	-33%
Cullingworth	200	350	150	+75%
Denholme	450	350	100	-23%
Wilsden	300	200	100	-33%
East Morton	150	100	50	-33%
Harden	150	100	50	-33%

Haworth	600	500	100	-17%
Menston	900	400	500	-55%
Oakworth	250	200	50	-20%
Oxenhope	150	100	50	-20%

2.47 The predominant reasoning for the reduction in figures is as a result of the downgrading of Burley in Wharfedale and Menston. Previously these were identified as Local Growth Centres, however both have subsequently been downgraded. This results in a reduction of homes in Local Growth Areas and also a dilution of distribution of the Local Service Centre allocated housing by virtue of it being distributed to a larger number of settlements.

Required Changes to Policy HO3

2.48 The Council need to ensure a better balance is struck between meeting the identified future needs for housing in Wharfedale and Airedale and adequately protecting the SPA and SACs that fall within the District boundaries. As it currently stands, this balance is not achieved and the imposition of a such a wide buffer zone is flawed in itself and will have the effect of constraining housing supply and investment in key areas of the District with the effect of producing an unbalanced and unsustainable local housing market in areas of Airedale and Wharfedale.

Phasing and Release of Housing Sites

2.49 The Council's approach to phasing and releasing of housing sites across the district is contained within **Policy HO4** of the CSDPD. It proposes to release land for housing development in two phases; one covering the first 8 years of the plan (2015 – 2023) and the other covering the remaining 7 years of the plan period (up to 2030). It is intended that whilst the phasing of the release of land will need to be consistent with Policy HO3 of the CSDPD, it will also depend on a number of future site allocating development plan documents coming forward which will provide further detail.

2.50 The justification for this approach for the Council is that a phased approach to housing is necessary to ensure a sustainable pattern of development and that the correct infrastructure is in place to support the housing. It is our Client's view that the notion of phasing the release of housing sites is **unsound** and on this basis objects to Policy HO4.

2.51 The Framework is clear in Paragraph 47 that it is the local planning authority's role to 'boost significantly' the supply of housing and subsequently the Framework does not support the

phased release of housing land. As a consequence the Council's approach is inconsistent with national planning policy and that Policy HO4 has not been prepared positively and is ineffective in light of Paragraph 47's overall approach.

- 2.52 The Framework supported by case law identifies that Councils should plan to meet the fully objectively assessed housing needs. The proposed reduction of housing delivery in the early parts of the plan is based on a infrastructure needs and creating sustainable patterns of development. This approach, resulting in a constrained housing target in the early parts of the plan period is not supported by evidence of a lower need in the early years of the plan. Consequently this approach will ultimately result in the Council not planning for sufficient housing to meet the objectively assessed housing need which exists. This approach is therefore clearly contrary to policy and **unsound**.
- 2.53 The need to provide a 5 year supply of housing land as highlighted in paragraph 47 is indeed important and it explicitly referenced by the Council in paragraph 5.3.70 of the CSDPD to support Policy HO4. It is noted however within the Council's own evidence base (namely the 2013 SHLAA update) that the Council currently does not have a 5 year housing land supply and in fact has a supply closer to 2.3 years (as a best case scenario) with a notable shortfall in dwellings which has accumulated over recent years.
- 2.54 To overcome this significant shortfall and given the confirmation in the PPG that any backlog should be addressed in the first five years, it is clear that the Council should be seeking viable sites much earlier in the plan to provide delivery and address its current shortfall. Phasing of sites in the way that the Council propose will not achieve such results (in fact it will simply exacerbate the situation); particularly as the Council are seeking to promote sites in regeneration areas and on previously developed land which are likely to have viability issues.

Required Changes to Policy HO4

- 2.55 To enable Policy HO4 to be sound, the Council need to remove the requirement to phase development over the plan period and to allow dwellings to come forward in a way which reflects the principles of paragraph 47 of the Framework.

Housing Density

- 2.56 **Policy H05** seeks a minimum density of 30dph across all sites. It is unclear whether such a requirement relates to net or gross site areas. Given other requirements within the plan,

such as open space and Policy DS3 it is important that any requirement should relate solely to the net developable area. This is particularly relevant to settlements where constraints such as flood zone 3 apply, whereby the land should only be developed in exceptional circumstances.

- 2.57 Whilst paragraph 47 of the Framework permits the Council to set out its approach to housing density to reflect local circumstances our Client has not seen any substantive evidence to support the Council's position. On this basis the policy is **unsound** as it cannot be justified.
- 2.58 It should also be noted that the policy requirements may create conflict with other policies particularly Policy HO8, which seeks larger homes and need for accessible homes both of which need larger floor areas and therefore will reduce densities, and Policy DS3 which seeks development to be within the context of its urban character.
- 2.59 Having considered the SHLAA sites available at Addingham, the assessment of the potential number of new homes is made based on 30dph gross area. This assessment, which is considered flawed, together with the setting of a minimum density, which in some places, such as Addingham may not be appropriate, forms part of the evidence base to demonstrate that no Green Belt review is required. Given that the exact details of developable sites, and details of the developable areas of those sites is not available at this time, together with the uncertainty over the appropriateness of the minimum density of 30dph applying to Addingham, this provides further evidence that the removal of reference to a Green Belt is inappropriate and premature at this stage.

Previously Developed Land

- 2.60 **Policy SO2** states that the Council should prioritise the use of previously developed land. This policy as worded is **unsound** as it is inconsistent with national planning policy contained within the Framework. The Framework instead seeks to 'encourage' the use of previously developed land (paragraph 17) which our Client believes should be used instead of the word 'prioritise'.
- 2.61 The approach to previously developed land is also contained in **Policy HO6**. This sets a target for the development of brownfield sites of 50%, with a minimum of 35% of all new homes in Local Service centres being provided on previously developed land.
- 2.62 Whilst the Framework allows local planning authorities to set such targets, the Council's own evidence (*Local Plan Viability Assessment*) identifies viability issues across much of Bradford

and its wider District. The danger is that such a brownfield target will simply exacerbate existing viability issues and will perpetuate the current undersupply of dwellings against current and future housing requirements.

2.63 The recently published PPG provides further guidance of brownfield land by stating:

"Local Plan policies should reflect the desirability of re-using brownfield land, and the fact that brownfield land is often more expensive to develop. Where the cost of land is a major barrier, landowners should be engaged in considering options to secure the successful development of sites. Particular consideration should also be given to Local Plan policies on planning obligations, design, density and infrastructure investment, as well as in setting the Community Infrastructure Levy, to promote the viability of brownfield sites across the local area. Provided sites are likely to deliver a competitive return for willing landowners and willing developers authorities should seek to select sites that meet the range of their policy objectives, having regard to any risks to the delivery of their plan."

2.64 Further to this is an underlying issue of supply to ensure that this target is deliverable. Having considered the SHLAA sites promoted in Addingham, no previously developed sites exist, a situation that no doubt occurs in other similar settlements. Providing for a minimum of 35% of new homes in Local Service Centres is provided on previously developed land could lead to an inadvertent moratorium upon development should insufficient sites exist.

2.65 Our Client's view is that the Council needs to provide evidence that delivering houses against this target is viable and that sufficient land exists to ensure that the minimum requirements can be met without restricting future supply. Failure to do this makes this policy **unsound** as it cannot be fully justified.

Housing Site Allocation principles

2.66 Our Client **objects** to **Policy HO7** and the principles for establishing future housing. This policy draws upon many of the principles established in other policies, to which we have objected, including prioritising previously developed land and the phasing of future sites. The objections raised within these representations on these matters equally apply to this policy.

Affordable Housing

- 2.67 Whilst our Client supports the notion of different affordable housing contributions in different areas of the District outlined in **Policy HO11**, we note from studying the Council's Local Plan Viability Assessment that the current proposals for affordable housing render developments in all areas apart from the highest value market areas as unviable even in the event of a significant pick-up in the market. On this basis the policy is **unsound** as it will be unjustified based on the Council's own evidence.
- 2.68 This situation deteriorates further when the cumulative impact of the CSDPD's policies are taken into account with the *Local Plan Viability Assessment* stating:
- "The cumulative impact of the proposed policy standards shows that even in the more viable parts of the District, the impact could be to compromise / undermine the delivery of development."*
- 2.69 This further reinforces that the policy as drafted is unsound. Whilst the policy allows for negotiation on the amount of affordable housing to be provided on a case by case basis (in relation to viability), as it currently stands, this would require the majority of schemes to go through this process which will further delay the delivery of much needed housing in Bradford.
- 2.70 This is particularly relevant in Wharfedale whereby the percentage of affordable homes is to increase to 30% and the threshold for provision is reduced from 15 dwellings to 5. To address this issue the Council should seek to reduce affordable housing levels to align with their viability assessment.

Green Belt

- 2.71 Whilst our Client supports the need for the Council to review the Green Belt to accommodate future development needs, it is concerned that **Policy SO7** only intends to undertake a selective review of the Green Belt and that this should be undertaken at the point when an Allocations development plan document has been adopted. Our Client believes this approach to Green Belt is ultimately **unsound**.
- 2.72 The Key diagram provides indicative locations for a Green Belt review and sub area policies also reference locations within the test. From examining these (other than correcting anomalies and re-assessing washed over settlements) the result of having a selective Green Belt review is predominantly aimed at Wharfedale, whereby only Ilkley is proposed for a review.

- 2.73 As per these representations it is clear from the SHLAA that insufficient sites can be delivered within Addingham without a Green Belt review. Even with the Councils proposed reduced figure of 200 homes this cannot be provided from non Green Belt SHLAA sites. Indeed, even if the SHLAA indicated that 200 dwellings could be provided this would not be confirmed until the Allocations DPD. Preventing a Green Belt review within this area potentially predetermines the Site Allocations DPD but more likely and more concerning prejudices the ability to allocate sufficient sites in Addingham, even to meet the constrained figure proposed in the plan.
- 2.74 On this basis Policy SO7 can be regarded as ineffective. Indeed the failure of the CSDPD to provide areas of future Green Belt release means that the Council will continue to under-deliver on housing and create uncertainty for the development industry. This will hinder the Council's ability to boost its housing supply as required by the Framework.
- 2.75 Given the challenges for development within Bradford and the requirement to ensure development of viable sites are brought forward, our Client believes the review of the Green Belt needs to be strategic in nature and should be undertaken in conjunction with other neighbouring authorities. As a result of this the Council should be taking a holistic view by doing a wider (rather than selective Green Belt review). The Council will no doubt be aware that the Main Modifications to Leeds Core Strategy suggested by their Inspector indicates a selective review to be inappropriate. The Inspector's modifications require the Council to undertake a more thorough review and remove the word 'selective' from the plan.
- 2.76 It is therefore our Client's view that to ensure the approach to Green Belt is effective, areas of release need to be identified in the CSDPD and that the approach should not be selective.

3.0 Conclusions

- 3.1 Whilst our Client supports the need for Bradford to produce an adopted development plan, our concern is that the CSDPD as currently drafted is unsound as many of the policies rely on future development plan documents to come forward in order that policies can be implemented. Many of these policies are vital to the future strategy of the District such as Green Belt and distribution of housing. As a result of this our Client believes the CSDPD itself can be regarded as unsound as its policies are ineffective.
- 3.2 This is particularly relevant when considering Wharfedale and specifically Addingham, whereby a disproportionate reduction in the level of new homes is not considered to meet the objectively assessed need and is not considered deliverable without alterations to the plan, specifically with regards amendments to the Green Belt.
- 3.3 Our Client's primary concerns are therefore regarding the Council's approach to the distribution of housing (Policy HO3) and the phasing of housing development (Policy HO4) both of which we believe are unsound and will be detrimental to the Council being able to delivery enough housing in the right places over the plan period and will create unbalanced and unsustainable housing markets. This issue is further exacerbated by the proposed selective Green Belt review which will not remove constraints, which are currently preventing growth in settlements, where new homes are required. In both instances we provided suggested amendments in order to make these policies sound.
- 3.4 In addition to this we highlight further concerns regarding several other key areas in the CSDPD that we believe are unsound/flawed including:
- Housing Requirements (Policy HO1);
 - Green Belt (Policy SO7);
 - Previously developed land (Policy SO2 and Policy HO6);
 - Affordable Housing (Policy HO11); and
 - Housing Density (Policy HO5);
- 3.5 We trust that our Clients comments will be duly considered and that we are able to discuss these further at the subsequent Core Strategy examination.