

**Bradford Local Plan**

**Core Strategy Examination Session Day Five**

**Matter 4B: Housing Supply**

**Date: 11<sup>th</sup> March 2015**

**Venue: Victoria Hall, Saltaire**

**Is the approach to identifying the strategic sources of housing supply fully justified with up-to-date and reliable evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

**1. Council's Response**

- 1.1. The Council considers that Policy HO2 provides a sound, justified, effective and positively prepared strategic framework for delivering the housing needed to meet the objectively assessed needs of the district as set out in Policy HO1.
- 1.2. The policy has been informed by a range of data and evidence and reflects a number of specific area based initiatives which are already well advanced either by virtue of the production of master plans or in some cases such as the Canal Road Corridor and Bradford City Centre, are at early stages of production of statutory Area Action Plans.
- 1.3. The areas selected and identified as growth areas are ones which are the most sustainable options for accommodating the district's housing needs. They vary in both scale and nature but in each case their deliverability has been verified by reference to a wide range of work including the land supply analysis within the Strategic Housing Land Availability Assessment (SHLAA) (EB049).
- 1.4. The need for new site allocations, new areas of growth, and green belt releases is justified in terms of the scale and pattern of deliverable land supply and the scale of housing needed within the district. The new Local Plan will be the first new strategic and local policy response to the needs of the district since the Replacement Unitary Development Plan (RUDP) was prepared in the early 2000's. The new plan is facing the challenge of accommodating a level of development far in excess of that within the RUDP.

**Is there sufficient evidence to justify the main strategic sources of housing supply, including completions and commitments, former RUDP sites, including safeguarded land, new deliverable/developable sites, area-based initiatives including Growth Areas, including Urban Eco-Settlement in Shipley/Canal Road Corridor, Bradford City Centre, SE Bradford, Queensbury, Thornton, Silsden and Steeton with Eastburn, Holme Wood Urban Extension, and local Green Belt releases;**

**2. Council's Response**

**Commitments, Completions, RUDP & Safeguarded Land**

- 2.1. The Council's housing requirement has been based on a number of components and includes an assessment of net additions to the supply as compared to the plan target in place. Net completions are therefore included as a listed element of supply within Policy HO2. These are taken from the annual Housing Flows Reconciliation Returns submitted to Government. Commitments form part of the potential future supply. These are sites which have an extant planning permission at a base date and are derived from the Housing Land Register. The Council considers that its information on completions and commitments is robust.
- 2.2. All remaining commitments are included as a matter of course within the Council's SHLAA but it should be stressed that all are assessed to determine whether they are

deliverable in the short term or developable in the medium and longer term. Commitments as indicated within the Council's Annual Monitoring Report are only included within the SHLAA trajectory and therefore have only been relied upon in formulating the Core Strategy's policies if they have been shown to be deliverable and developable.

- 2.3. Former RUDP sites and safeguarded land sites have also been included within the SHLAA but again have been assessed against the tests of suitability, availability and achievability, subject to comment and scrutiny from the SHLAA Working Group and are only included in the potential land supply as indicated in the SHLAA trajectory if they have been judged to be deliverable or developable.
- 2.4. The Council therefore considers that the inclusion of completions, commitments, former RUDP sites and safeguarded land sites is fully justified and that their potential contribution to meeting need has been properly tested and verified.

### **New Deliverable and Developable Sites**

- 2.5. From, right at the start of the Core Strategy process, with preparation of the first SHLAA underway, it has been clear that the future need for new homes in the district is not capable of being met purely from existing undeveloped housing sites and commitments. The element 'new deliverable and developable sites' simply reflects this fact. The Council has through the work carried out on 3 SHLAA's put together a database of potential sites informed by its own survey work, sites on the Councils Housing Land Register, studies such as the Bradford Growth Assessment and submissions made during and subsequent to its initial 'call for sites'. These have been submitted by land owners, developers and members of the public. The Council have also liaised with a range of partners including its own Asset Management service to identify surplus land which may be suitable for future development. The process of identifying new sites is inevitably an evolving and continuing process which will be taken forward into the Allocation DPD. The Allocations DPD will include a new 'call for sites' in the summer.

### **Shipley/Canal Road Corridor, Bradford City Centre, SE Bradford & Holme Wood**

- 2.6. The Council considers that there is extensive evidence to justify the inclusion of these 3 locations as growth areas within the Core Strategy. These are the three areas where the most detailed work has already been undertaken to examine and bring forward comprehensive proposals for growth and regeneration and the provision not just of new housing but also of supporting infrastructure and green space.
- 2.7. The three areas are all different in terms of their current make up, the proposals being brought forward and the mechanisms for delivery. The City Centre is an area currently with a modest housing offer but with massive potential for future development in particular in the re-use of its rich tapestry of historic buildings. It is however an area in need of ongoing regeneration and where the developing housing offer was effectively put on hold at the onset of the housing market crash of 2008. Confidence in the City Centre is now growing rapidly and there have been a range of investment proposals and projects which have been announced in the retail and commercial sectors over the last year which underline this. Most significantly the Westfield shopping centre is now under construction with a likely opening date of Autumn this year.
- 2.8. The Council is also investing heavily in the City Centre in terms of both physical projects and support for businesses. It is introducing a Local Development Order and Local Listed Building Consent Order to simplify the planning process in the City Centre and encourage the re-use of buildings of heritage value. It has also introduced a

scheme offering rate relief to businesses in the city centre. It is facilitating the development of key sites including and is continuing to build on the success of its award winning City Park with a programme of events which are designed to promote the centre as a vibrant place.

- 2.9. The Council's Area Action Plan for the City Centre is already well underway and is bringing forward a suite of policies to support and reflect the range of projects and initiatives.
- 2.10. The Council and its partners have been undertaking detailed regeneration work in Bradford city centre over the last 15 years. In 2003, the Bradford Centre Regeneration Urban Regeneration Company produced the City Centre Masterplan (Will Alsop, 2003) which set out a new vision for the future of the city centre. The Masterplan was followed up with four detailed neighbourhood design frameworks which were adopted by the Council in 2007 as material consideration in the determination of planning applications pending the adoption of the Bradford City Centre AAP.
- 2.11. Further work was commissioned by the Council in 2013 to review the Masterplan and the Neighbourhood Development Frameworks. The Council approved the Bradford City Plan on 10 February 2015 which will help support delivery of the Council's ambitions for the City Centre and will inform the detailed work on the AAP in line with the Core Strategy. The City Plan is a non statutory plan which will act as the overarching regeneration delivery plan for the development of the city, including the establishment of shared principles to govern regeneration in the city centre, establish investment priorities, align planning and infrastructure investment and ensure a partnership approach to tackling issues affecting the city centre.
- 2.12. All of the initiatives within the city centre are designed to and expected to stimulate further development and investment including from housing developers. The Core Strategy growth area proposal and the housing target for the city centre also align with the latest evidence on land supply from the third SHLAA. The additional work which the Council has done to identify site options and assess deliverability has meant a significant increase in the available capacity in the current SHLAA as opposed to the SHLAA Update of 2013. Although the figures are provisional, the Council estimates a capacity of approximately 5,018 within the city centre. The proposals for the City centre as a growth area within Policy HO2 are therefore considered to be justified, reasonable, deliverable and based on up to date evidence.
- 2.13. The growth area identified for the Shipley and Canal Road Corridor area also reflects significant work already undertaken and the content of the emerging statutory Area Action Plan. The AAP has already been subject to issues and options consultation in March 2013. The Shipley and Canal Road Corridor extends from the northern edge of Bradford City Centre to Shipley. It includes Shipley town centre and areas of housing, open space, industry and employment located alongside Canal Road. The Canal Road Corridor is a priority regeneration area in the Bradford district and has been identified as one of four Urban Eco Settlement locations within the Leeds City Region.
- 2.14. The Shipley and Canal Road Corridor proposals have been informed by a number of reports, studies and strategies. This includes a Strategic Development Framework commissioned from consultants BDP, itself subject to consultation in February 2012. The Canal Road Corridor area includes a number of distinct areas and strategic development opportunities:

- **ShIPLEY Town Centre** - Shipley is an important town centre, which is a focus for future investment to deliver major improvements through the expansion of its retail, leisure, office and housing market offer;
  - **Canal Road Urban Village New Bolton Woods Masterplan Site** - An 'asset based' Joint Venture Company between the Council and Urbo Regeneration Ltd, with the aim of delivering large scale regeneration within the designated Joint Venture Partnership Area.
  - **Bolton Woods Quarry** - A large operational mineral extraction site with a buffer zone to prevent further expansion;
  - **Employment zones** - Including Canal Road employment zone and Shipley employment zone to the south of Otley Road
  - **Forster Square and Valley Road Retail Area** - Existing area of large retail units including a Tesco food store and Forster Square Retail Park;
- 2.15. The Council are confident that the proposals for the Shipley and Canal Road Corridor are reasonable, justified and deliverable. It has already put in place mechanisms to ensure the delivery of the key central section of the corridor via the establishment of a Joint venture Company between the Council and Urbo Regeneration Ltd. The housing target for the area is based on the work carried out within the SHLAA and this in turn has been informed by the work being carried out as part of the AAP by both Council officers and its partners.
- 2.16. The Council also considers that its plan and proposals for a growth area in South East Bradford incorporating development both within the existing urban area and adjoining it in the form of an urban extension at Holme Wood are reasonable and justified. Work is also fairly advanced on this concept. It has been taken forward via the production of a Neighbourhood Development Plan (PS/B001b iii) and this in turn has involved extensive research and consultation. The Neighbourhood Plan commenced before the advent of the Localism Act and is therefore not a neighbourhood plan under the auspices of that Act. The development proposals for this area represent a comprehensive framework which will deliver both housing growth and regeneration of the existing urban area. It involved rationalising and re-using land within the urban area as well as a urban extension within its adjoining green belt.
- 2.17. The proposed housing target for the Bradford SE area within Policy HO3 has been informed by the SHLAA and is therefore deliverable in land supply terms. The Bradford Growth Assessment (EB037) has highlighted the Bradford SE area including Holme Wood as one of the most sustainable and suitable locations for an urban extension within the urban area. In green belt terms the proposals would in no way undermine the strategic functioning of the green belt or the separation of Leeds and Bradford. Put simply there is no other currently identified area within or adjoining the main urban area of Bradford which offer a more sustainable or appropriate location for growth than Holme Wood. The overall land supply constraints within the urban area means that if housing need is to be met then this urban extension will have to be brought forward.

### **Queensbury, Thornton, Silsden and Steeton with Eastburn**

- 2.18. Within the Core Strategy the Council has also sought to identify a number of growth areas albeit at a slightly smaller scale which should also make a significant contribution to meeting overall housing need during the plan period. These areas have been identified via a combination of:
- Applying the settlement hierarchy as set out in Policy SC4. The settlement hierarchy in turn reflects the size role and function of the settlements, the range of services they offer and their accessibility to the public transport links;

- Assessing the nature and scope of land supply across the district as revealed by SHLAA;
  - Assessing key environmental factors such as flood risk zones and areas of national and international wildlife and habitat importance such as the South Pennines Special Protection Area (SPA) which may either limit development opportunities or suggest that other options may be more sustainable options;
- 2.19. These growth areas – at Silsden, Steeton with Eastburn, Queensbury and Thornton all benefit from offering a significant range of services and being accessible to larger centres of employment and services i.e. Bradford and Keighley. In each case the SHLAA indicates that the land supply exists to deliver the level of growth proposed.

### **Local Green Belt Releases**

- 2.20. The Council has set out in both its Housing background Paper 2 (SD016, page 28) and in its responses to objections made to the Core Strategy Publication draft (SD001 pages 160-161 ) the justification and background to the conclusions that there is unequivocal evidence of the need for green belt releases to meet the district's future housing needs and secondly that such releases can be made in sustainable locations and in ways which would ensure that a properly functioning green belt is maintained.

## **Is the policy founded on an up-to-date, accurate and comprehensive assessment of housing land availability, including SHLAA?**

### **3. Council's Response**

- 3.1. The Council considers that the Core Strategy's housing policies including Policy HO2 have been informed by a comprehensive and robust assessment of housing land availability. The Council's Publication draft Core Strategy was informed by the SHLAA update published in May 2013 (EB049). A third SHLAA is currently well advanced and some preliminary results from this are attached at Appendix 1 to this position statement for information and to inform debate through the Examination In Public (EIP) process.
- 3.2. The Council considers that the SHLAA Update published in May 2013 was produced in accordance with government guidance and was comprehensive in its approach to identifying potential development sites. Sites were obtained from a wide variety of sources including survey work, call for sites submissions, and the council's asset management register. Given the scale, nature and challenge of the housing required it was clear from the outset that it would be inappropriate to exclude sites which were not compliant with current policy such as green space and green belt. The result was a study which took a 'local policy off' approach but which categorised sites which were otherwise deliverable in way which enables the policy choices facing the local plan to be apparent.
- 3.3. The analysis of sites complied with the Government's suggested 3 tests of suitability, availability and achievability. A large amount of information was gathered on each site to try and obtain as comprehensive view on a site's developability as possible.
- 3.4. The SHLAA was also robust in that it took informed, balanced and reasonable decisions on assessing site yields and rates of development informed by comments received from the development sector who were, as Government guidance requires, represented on the SHLAA Working Group. The decisions taken involved discussion and compromise on both the Council and the Working Group side.

- 3.5. In each of the 3 SHLAA studies the approach agreed with the Working Group has been for the Council's officers to carry out initial site appraisals which determine whether and when a site might be developed and then to forward those appraisals to the Working Group for comment. A period of amendment and moderation of the results then follows. In each case the Council and Working Group members have been able to agree on the site assessment outcomes for the majority of sites.
- 3.6. The Council therefore considers the SHLAA to be robust. A range of comments and objections have been received which relate to the SHLAA. Some have been based on a misunderstanding of what the SHLAA actually is. Some have claimed that the SHLAA does not contain a comprehensive list of site options particularly options on brownfield sites. For the most part those objections either fail to identify what site options have been missed or mention options which are actually within the SHLAA. The SHLAA in the Council's view gives an accurate picture of the general scale and distribution of site options but given the time it takes to prepare and that new sites and buildings become available on a continual basis there will always be a limited number of sites which do not feature in the latest iteration of the study. The public have had ample opportunity to provide comments and suggest sites either via the Council's call for sites exercise or through the Bradford telegraph and Argus's campaign which invited SHLAA submissions as part of its 'Save our Greenspace' campaign.
- 3.7. As indicated above the Council are currently completing a third SHLAA in conjunction with the SHLAA Working Group. The latest update has resulted in a small increase in the number of sites within the study which now total 1056. These sites have come from a number of sources including:
- New sites which have obtained planning permission since the last SHLAA;
  - Additional sites submitted by landowners, developers and the public;
  - Additional green belt sites arising from a review of the results of the Bradford Growth Assessment;
  - Sites resulting from a reduction in the site size threshold from 6 units to 5 units;
  - Land and buildings in the city centre identified from detailed work undertaken for the City Centre AAP and from notification by landowners of their intention to convert former offices to residential uses;
- 3.8. The update has also involved reviewing the information on all sites already on the SHLAA 2 database. All sites – both existing and new were then assessed against the three SHLAA tests and if considered deliverable or developable were placed in the 17 year development trajectory according to the standard rules agreed with the Working Group. Yields continue to be assessed according to a number of bandings which relate to the location and type of housing envisaged. Site appraisals were forwarded to the SHLAA Working Group and comments and / or suggested changes were made by the working group for around 1/3 of those sites. The Council have now reviewed those comments and made changes where considered appropriate – these responses have been returned back to the Working Group for further consideration. From this it can be seen that the SHLAA process is nearing agreement on the majority of sites. Further adjustments may still be needed but the land supply figures for the different settlements contained in Appendix 1 give a reasonable update on land supply to inform debate at the EIP.

## **Is a better strategic framework needed for designated Growth Areas?**

### **4. Council's Response**

- 4.1. As stated above the designated growth areas vary widely in terms of the scale of growth and the scale of change being envisaged. Even in those areas where the scale of growth and change is greatest – the City Centre, the Shipley and Canal Road Corridor, Bradford SE / Holme Wood, the Council considers that the Core Strategy provides appropriate strategic framework. In this respect the plan needs to be read as a whole. The sub area policies in particular give a more detailed picture and portrait of the scale and nature of development and in some cases the infrastructure envisaged.
- 4.2. The City Centre and Shipley and Canal Road Corridor AAP's and the Holme Wood urban extension have been informed by a considerable body of work, evidence and consultation. Details of required infrastructure have as necessary been incorporated within the Council's Local Infrastructure Plan (LIP) (EB044). The Council considers it unnecessary to repeat sections of these documents within the body of the Core Strategy. Moreover some of those details may well change as work on these area specific programmes progresses further.
- 4.3. Planned infrastructure is currently set out in the Infrastructure Delivery Schedule of the LIP. This will be updated by the council when necessary, to incorporate relevant infrastructure providers' future plans. The LIP must be able to respond to changing needs and circumstances over the plan period. Consequently it is a 'live' document and will be updated taking account of all the changes as they come forward. Further work is ongoing to support the development of an urban extension at Holme Wood. This will inform the detailed consideration of the allocation of land within the Allocations DPD,



**Table 1: Provisional SHLAA 3 Land Supply By Settlement & Comparison With SHLAA 2 Data**

<b>SETTLEMENT</b>	<b>SHLAA 2 Capacity</b>	<b>Provisional / Moderated SHLAA 3 Capacity</b>	<b>CSPD Proposed Target</b>
City Centre	2752	5018.5	3,500
Canal Road	3599.5	3096.5	3,200
Shipley	1283	782	1,250
Bradford SE	6607	6036.5	6,000
Bradford NE	5171	4431.5	4,700
Bradford SW	6180	6749	5,500
Bradford NW	4745	5632	4,500
<b>Regional City Total</b>			<b>28,650</b>
Ilkley	1790	1841.5	800
Keighley	5233	4793	4,500
Bingley	2196	1700.5	1,400
<b>Principal Towns Total</b>			<b>6,700</b>
Queensbury	1748	1725	1000
Silsden	2026	2251.5	1000
Steeton	884.5	1263	700
Thornton	863.5	1066.5	700
<b>Local Growth Centres Total</b>			<b>3,400</b>
Addingham	1153	1137	200
Baildon	883.5	830	450
Burley In Wharfedale	1094	1291	200
Cottingley	681	275	200
Cullingworth	241	464	350
Denholme	848	662.5	350
East Morton	300.5	496	100
Harden	86	250	100
Haworth	695.5	852.5	500
Menston	1166.5	1062	400
Oakworth	495.5	576.5	200
Oxenhope	50.5	122	100
Wilsden	936	923	200
<b>Local Service Centres Total</b>			<b>3,350</b>
<b>District Wide Total</b>	<b>53,708</b>	<b>55,329</b>	