

Local Development Framework for Bradford

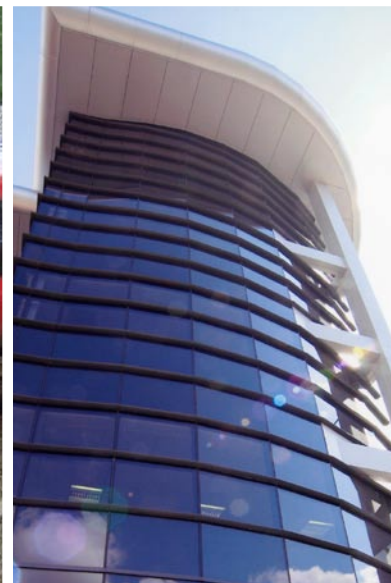
Core Strategy

Issues and Options

Summary of Representations

Topic Paper 3: Housing

December 2007



City of Bradford MDC

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यह दस्तावेज़ उन बहुत से दस्तावेज़ों में से एक है जिनसे मिलकर ब्रैडफोर्ड डिस्ट्रिक्ट का लोकल डिवेलपमेंट फ्रेमवर्क बनता है। यदि आप इस दस्तावेज़ की जानकारी का हिन्दी अनुवाद या इसे ब्रेल, बड़े अक्षरों या टेप पर प्राप्त करना चाहते हैं, तो कृपया लोकल डिवेलपमेंट फ्रेमवर्क ग्रुप से (01274) 434050, (01274) 434544 या (01274) 434606 पर सम्पर्क करें।

ਇਹ ਦਸਤਾਵੇਜ਼ ਅਜਿਹੇ ਬਹੁਤ ਸਾਰੇ ਦਸਤਾਵੇਜ਼ਾਂ ਵਿਚੋਂ ਇਕ ਹੈ ਜਿਨ੍ਹਾਂ ਨਾਲ ਬਰੈਡਫੋਰਡ ਡਿਸਟ੍ਰਿਕਟ ਦਾ ਲੋਕਲ ਡਿਵੈਲਪਮੈਂਟ ਫਰੇਮਵਰਕ ਬਣਦਾ ਹੈ। ਜੇਕਰ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਵਿਚ ਦਿੱਤੀ ਗਈ ਜਾਣਕਾਰੀ ਦਾ ਪੰਜਾਬੀ ਅਨੁਵਾਦ ਜਾਂ ਇਸਨੂੰ ਬ੍ਰੇਲ, ਵੱਡੇ ਅੱਖਰਾਂ ਜਾਂ ਟੇਪ 'ਤੇ ਪ੍ਰਾਪਤ ਕਰਨਾ ਚਾਹੁੰਦੇ ਹੋ ਤਾਂ, ਕ੍ਰਿਪਾ ਕਰਕੇ ਲੋਕਲ ਡਿਵੈਲਪਮੈਂਟ ਫਰੇਮਵਰਕ ਗਰੁੱਪ ਨਾਲ (01274) 434050, (01274) 434544 ਜਾਂ (01274) 434606 'ਤੇ ਸੰਪਰਕ ਕਰੋ।

ब्राडफोर्ड डिस्ट्रिक्ट (Bradford District) এর লোক্যাল ডেভেলপমেন্ট ফ্রেইমওয়ার্ক (Local Development Framework – স্থানীয় উন্নয়ন কাঠামো) এর অনেকগুলো কাগজপত্র বা দলিলপত্রের একটি হলো এই তথ্যপত্রটি। এই তথ্যপত্রের বিষয়বস্তু কমিউনিটির লোকদের কোনো ভাষায় বুঝতে চাইলে অথবা লিখিত অনুবাদ চাইলে নতুবা তা ব্রইলে (অক্ষলিপিতে), মোটা হরফে কিংবা ক্যাসেটে রেকর্ড করে চাইলে, অনুগ্রহ করে লোক্যাল ডেভেলপমেন্ট ফ্রেইমওয়ার্ক গ্রুপ (Local Development Framework Group)-কে (01274) 434050, (01274) 434544 বা (01274) 434606 নাম্বারে ফোন করুন।

ਆ ਦਸਤਾਵੇਜ਼ ਬਹੁਮਾਂ ਨੂੰ ਐਕ ਓ ਕੇ ਜੇ ਐਡਰੈੱਸ ਡਿਸਟ੍ਰਿਕਟ ਨਾਂ ਸਥਾਨਿਕ ਵਿਕਾਸ ਨੀ ਰੂਪਰੇਖਾ ਅਨਾਵੇ ਓ. ਜੋ ਤਮਨੇ ਆ ਦਸਤਾਵੇਜ਼ਾਂ ਵਧਾਉਣ ਨੂੰ ਪ੍ਰਾਇਰਿਟੀ ਆਖਿਆ ਆਖਿਆ ਆਖਿਆ ਅਥਵਾ ਤੇਨੋ ਅਰਥ ਸਮਝਵਾਨੀ ਜੜ੍ਹ ਜੜ੍ਹਾਯ, ਅਥਵਾ ਤਮਨੇ ਤੇਨੀ ਜੜ੍ਹ ਐਠਲ, ਆਰਜ਼ ਮਿ-ਟ ਕੇ ਪਈ ਟੇਪ ਓਪਰ ਡੋਯ, ਜੋ ਮਠੇਰਆਨੀ ਕਰੀ ਲੋਕਲ ਡਿਵੇਲਪਮੇ-ਟ ਫ਼ੇਮਵਰਕ ਗ੍ਰੁਪਨੋ (01274) 434050, (01274) 434544 ਅਥਵਾ (01274) 434606 ਪਰ ਸੰਪਰਕ ਕਰੋ.

یہ دستاویز بریڈفورڈ ڈسٹریکٹ کے مقامی ترقیاتی لائحہ عمل سے متعلقہ دستاویزات میں سے ایک ہے۔ اگر آپ کو اس دستاویز کا زبانی یا تحریری ترجمہ کسی بھی کمیونٹی زبان میں درکار ہو یا آپ اسے بریل، لارج پرنٹ یا ٹیپ میں چاہتے ہیں تو براہ مہربانی لوکل ڈیولپمنٹ فریم ورک گروپ سے ٹیلی فون نمبر: 01274 434544، 01274 434050 یا 01274 434606 پر رابطہ کریں۔

LIST OF CONSULTEES WHO SUBMITTED COMMENTS ON TOPIC PAPER 3

1. Addingham Parish Council
2. Airedale Partnership
3. Arnold Laver (submitted by Drivers Jonas)
4. Baildon Community Council
5. Ben Rhydding Action Group
6. Bolsterstone Plc (submitted by Drivers Jonas)
7. Bradford Centre Regeneration
8. Bradford District Chamber of Trade
9. Bradford Ornithological Group
10. Bradford and Airedale Teaching Primary Care Trust
11. Commercial Estates Group
12. Dacre, Son and Hartley
13. Environment Agency
14. Giggleswick School (submitted by GVA Grimley)
15. Government Office for Yorkshire and the Humber
16. Hallam Land Management (submitted by Nathaniel Lichfield & Partners)
17. Home Builders Federation
18. Ilkley Civic Society
19. Ilkley Parish Council
20. Keyland Developments Ltd (submitted by Sanderson Wetherall)
21. Miller Strategic Land (submitted by Erinaceous Planning)
22. Oxenhope Parish Council
23. Patchett Homes
24. Ramblers Association
25. Redrow Homes
26. Royal Society for the Protection of Birds
27. Save Us Pub
28. Taylor Woodrow Developments Ltd (submitted by Spawforths)
29. West Register Realisations Ltd (submitted by The Land and Development Practice)
30. West Yorkshire Archaeological Advisory Service
31. Yorkshire and Humber Assembly
32. Yorkshire Forward
33. Yorkshire Water

COMMENT	ORGANISATION
GENERAL	
We hope that Bradford Met will examine carefully the figures produced by Yorkshire and Humberside, as those produced centrally for the existing UDP were an overestimate. There could well be scope for more than 60% development on brown field sites	Baildon Community Council
We are disappointed that there is so little emphasis on affordable housing when it is clearly the top priority in PPS3. The suggestion that the target in Wharfedale is 40% of development is disingenuous when in the UDP and RUDP it was merely a figure, which at its best could be taken as a suggestion. Given that the report last year by the Rural Housing Enablers on Housing Need in Ilkley concluded that... between 9.1% and 12.9% of the population identified a housing need that equates to something in order of 1,400 people in housing need. Clearly there needs to be a much more robust approach to this problem and that can only be done by significantly lowering the threshold for development particularly on windfall sites from the present 25 units to something like 10 or less.	Ben Rhydding Action Group
A successful conclusion to these plans should ensure some of Bradford's futures housing needs are met. However if some of the plans are depleted/changed to an extent where it creates a major shortfall on original estimates then we are then left with using existing land availability to build on, and as such matching up availability. Gypsies/ travellers- Travellers sites should be available to prevent them camping illegally on council or private land.	Bradford District Chamber of Trade
The tPCT welcomes the aim of increasing the provision of affordable housing and the recognition of the growing young and elderly populations. It also affirms the need for housing location to support access to key services such as education, employment, health and leisure.	Bradford tPCT
Firstly, we note that the Council is currently preparing an Urban Potential (UPS). We request that the scope of this study cover the whole of the District in order to assess the housing potential study of all settlements. We also highlight that such a study should be carried out in accordance with PPS3's emerging guidance on preparing Strategic Housing Land Availability Assessments.	Commercial Estates Group
The 2001 census and 2006 Household formation figures in paragraph 3.2 appear not to match those in Topic Paper 2 key facts under paragraph 2.13. The key facts in this topic paper suggest 2,384 additional homes (net) per annum 2001- 2016. The Topic Paper 3 paragraph 3.2 suggests 1,666 per annum 2001 – 2016. This needs to be corrected. We also request reference be made to the much higher 2004 based regional household formation forecasts released by Government earlier this month given they are 35% higher for this	Dacre, Son and Hartley

<p>region than the 2003 forecasts.</p> <p>On the matter of housing provision, we remain concerned that Bradford Council has requested a lower than Government forecast for the Bradford District in the emerging RSS. In our opinion, the Council's intentional aim to supply below forecast requirement will only exacerbate the delivery of much needed family and affordable housing and is socially irresponsible act. Furthermore, the desire to supply fewer homes than the amount forecast could damage the economic prospects of the district as workers are unable to find homes that meet their aspirations.</p>	
<p>Para 2.3, 3rd bullet & 3.0 – Provision for housing should be a period of <i>at least</i> 15 years from adoption. Will need to have close regard to PPS3 (especially paras 52-61) when taking the DPD through its further stages and the latest version of draft RSS.</p> <p>Paras 2.5 & 3.16 - Will need to ensure that the requirements of ODPM Circular 01/2006 (particularly paras 30 & 31) relating to policy content of Core Strategies for gypsy and traveller sites are complied with.</p> <p>Para 3.6, Options - A combination of Options may be the most appropriate way forward. However options which do not reflect PPS3 and the latest version of draft RSS without robust local justification are unlikely to lead to a sound plan. In particular housing development which would lead to a significant increase in dispersed settlement patterns (including the use of safeguarded land if more sustainable options which accord with national and regional policy are available) is unlikely to be acceptable.</p> <p>Para 3.10 - With regard to windfalls, attention is drawn to para 59 of PPS3. The aim should be to plan for housing through allocation of sites (detailed in appropriate allocations DPD) or (if insufficient site provision can be made, and can be fully justified) indicating broad locations for future growth in the Core Strategy. Should not rely on windfalls without robust local justification.</p> <p>Para 3.11 – Options – Please see paras 40-44 and 62-67 of PPS3 about the balance between greenfield and previously developed land supply and the managing of delivery of this. The focus should be on development of previously developed land at suitable sustainable locations. Some flexibility will be needed to accommodate any requirements for changes in provision e.g. through RSS.</p> <p>Para 3.14 & 3.15 & Options – Please see paras 27-30 of PPS3. The Council will need to consider requirements for 'social rented' and 'intermediate' affordable housing also the desirability of varying site size thresholds and proportions of affordable housing to be provided according to the local circumstances across the district. Will also need to consider whether there should be a policy on rural exception sites for affordable</p>	<p>Government Office for Yorkshire and the Humber</p>

<p>housing.</p> <p>Para 3.17 & Options – Please see paras 20-24 of PPS3.</p> <p>Para 3.21 – Options & Questions – A balance will be needed. Options favouring extreme measures e.g. protecting all land and buildings are unlikely to reflect national and regional policy. There may be local justification for limited development in smaller settlements e.g. for local needs/affordable housing in the interests of sustainability.</p>	
<p>Paragraph 3.6 identifies that historically a large proportion of housing in the District has come forward from windfall sources, namely those sites which had not been identified for housing in the UDP. The windfall agenda of PPG3 has now been replaced by the more recent national policy of PPS3. Paragraph 59 of PPS3 advises that an allowance for windfall sites could no longer be included in the first 10 years of land supply unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. It is clear therefore that PPS3's emphasis is now firmly increasing certainty by identifying sufficient deliverable and developable sites to meet the district's housing requirement over the LDF period. In respect of the district's urban potential study (UPS) we note that the preparation of such a document is no longer a policy requirement of PPS3 given the deletion of the sequential approach. Rather PPS3 advises local planning authorities to prepare strategic housing land assessments (SHLA) we suggest that the methodology of the SHLA reflects the advice of PPS3 in terms of its assessment of the deliverability and developability of potential housing sites.</p>	<p>Hallam Land Management</p>
<p>PPS12 paragraph 4.24 sets out the 9 tests of soundness to be considered in the preparation and examination of a Development Plan Document with test iv requiring plans and strategies to be consistent with the regional spatial strategy for the region. The locational principles are inconsistent with the draft RSS. The issues and options demotes the RSS principal service centres, ignores the RSS growth areas of Leeds/Bradford link and the Airedale corridor from the city centre to Craven. This needs to be corrected to ensure that the Core Strategy is not found to be unsound.</p>	<p>Home Builders Federation</p>
<p>There needs to be flexibility – there is a case for careful assessment of need at more frequent intervals than 10 yearly national censuses and should take account of the type of housing needed. A different mix will be required in different settlements.</p>	<p>Ilkley Civic Society</p>
<p>We note that the housing requirement for Bradford is a significant increase on the housing requirement rates set out within the replacement UDP. Support has been expressed by house builders for increased requirement rates particularly in the regional and sub-regional centres and in the Leeds region (draft RSS). Unfortunately the Panel Report into the emerging RSS is not currently available and we are all therefore uncertain as to whether the requirement figures are proposed to be increased in line with comments made.</p>	<p>Miller Strategic Land</p>

<p>We raise no objection to the currently stated housing requirement figures but would support any increase that may arise through the emerging RSS. It is noted that some Housing Sites in the RUDP have not come forward may assist in delivering housing requirements within the LDF period, it is considered that the potential supply should be carefully assessed and serious questions raised over why undeveloped sites have failed to come forward to date. A realistic approach needs to be adopted to supply in order for the LDF to be robust and deliverable.</p>	
<p>All sites should have a presumption in favour of development and words such as 'limited' and 'minimal' development should not be used, as it indicates the wrong mind set.</p>	<p>Patchett Homes</p>
<p>We welcome the references to RSS and the summary that provides the context for this consultation paper. The Assembly supports the references to the housing targets of draft RSS, which proposes that Bradford's housing requirement should 5 increase above existing targets identified in existing RSS (2004) of 1,390 new dwellings per year to 1,560 by 2011 rising to 2,180 by 2021 to meet future demand.</p>	<p>Yorkshire and Humber Assembly</p>

THE HOUSING SUPPLY	
Q 3.1 HOW BEST SHOULD THE ADDITIONAL HOUSING REQUIREMENT SET OUT BY THE REGION BE ACCOMMODATED IN THE DISTRICT?	
<p>It is recommended that the Core Strategy should seek to locate the additional housing requirement within sustainable locations, including previously developed sites where the creation and maintenance of sustainable communities can be encouraged.</p> <p>Previously developed land and buildings should be allocated for a mix of uses, thus allowing the development residential dwellings alongside retail and employment uses. This would reduce the reliance on windfall sites to meet housing need.</p> <p>Mixed use allocations would allow for the housing market to influence the location of residential developments, resulting in residential uses being developed on sites where there is an identified housing need.</p> <p>Arnold Laver therefore support the redevelopment of underused land and buildings in the inner areas.</p> <p>Would like to reinforce the importance of the Canal Road Corridor to securing the regeneration of this area of the District and improving linkages to and between existing communities. Arnold Laver are therefore also supportive of focusing the majority of the development in the City Centre Neighbourhood Development Areas and along the route of the proposed Bradford Canal.”</p>	Arnold Laver
<p>We think this would be best met by focusing the majority of development in the city centre neighbourhood development centre. And along the route of the proposed Bradford Canal and by redeveloping underused land and buildings in the inner city areas.</p>	Baildon Community Council (
<p>The outcome of the Urban Potential Study should inform the answer to this question more accurately but a combination of locating housing in the city centre and along the route of the Canal and by redeveloping underused land and buildings in the inner areas offers considerable potential and addresses the brownfield target of 60%.</p>	Bradford Centre Regeneration
<p>We partially support such changes in outer areas, but make the point that wholesale changes to smaller pockets of land/redundant buildings in outer and sometimes rural areas could have a more damaging effect on future employment opportunities of local communities. We do however concede that new house builds in the location of out of town retail communities could help revitalise existing retail properties which could hopefully result in more shops/ businesses opening.</p>	Bradford District Chamber of Trade
<p>In seeking the answer the above question, we note that the options, which follow Question 3.1, list five bullet options.</p>	Commercial Estates Group

<p>In terms of how the District housing requirement should be met, we offer support for bullet point four which states:</p> <p>“By allowing peripheral towns and villages to enlarge (including the use of safeguarded land and/or green belt.)”</p> <p>In the above regard, we note that there is likely to be existing opportunities within these settlements, including on previously developed land, which will support housing employment growth without resulting in the outward expansion of settlement. In our view these development opportunities should be maximised in meeting the housing requirement. Again, in these circumstances, we feel that sufficient flexibility should be included within the Core Strategy to allow these important opportunities to be supported.</p> <p>We note the advice of PPS3 on this matter, which advised that sufficient sites should be identified by LDFs to provide for a range of housing types, and therefore the focus should not be solely on central urban brown field sites.</p>	
<p>The focus of future housing supply on City Centre or brownfield only sites will result in a supply rate no higher than the current 1,300 units per annum at a time when forecast demand is 2,000 per annum.</p> <p>The release of Phase 2 RUDP sites should be brought forward to meet current under-supply and future releases should be based upon informed housing market areas tied into economic growth forecasts.</p> <p>The table under paragraph 3.7 of the Housing Topic paper reports on net completions for the period 2001 to 2005 and shows build rates failing to meet the RUDP requirement of 1,390 additions per annum as set out by RPG12. The fourth column in that table is therefore misleading as the annual average completions over the remaining plan period for 2001 onwards should all be well in excess of 1,390.</p> <p>In order to understand the actual rates of delivery better, we request the evidence base be presented split into the five constituency areas and include; gross build, demolitions and net build rates.</p>	Dacre, Son and Hartley
<p>The location of housing should be determined whilst taking into account flood risk. Any areas of high risk zone 3 identified for housing should demonstrate through the sequential test would also require application of the Exceptions Test.</p>	Environment Agency

<p>Enlarging the main urban area with urban extension sites The site at Ben Rhydding Drive is bound on 3 sides by existing residential development, and is therefore considered to represent a logical extension to an established urban area. Although outside of the main urban area, Ilkley is designated as an urban area within the adopted Bradford UDP. The site has convenient access to public transport, and is situated in close proximity to Ben Rhydding train station and is well well served by a frequent bus service. The land at Ben Rhydding Drive is therefore considered to represent an opportunity for an appropriate and sustainable extension to an established urban area.</p> <p>Allowing peripheral town and villages to enlarge It is considered that the site at Ben Rhydding Drive represents a rational extension to the existing urban area. We would therefore support the future allocation of suitable sites within towns that are peripheral to the existing main urban area. The allocation of suitable green field sites within the district is necessary to achieve housing targets. In Ilkley, an area of strong market performance, high quality dwellings could be developed to reinforce the existing character of the area. The scale and form of such development is unlikely to be suited to many of the available brownfield sites within the district. The allocation of this green field site would ensure that an appropriate mix of dwellings is available to cater for the open market and affordable housing needs of a range of people within the district. In particular, the site at Ben Rhydding Drive has the capacity to accommodate an appropriate mix of housing</p> <p>Combination of any/all of the approaches Given the scale of additional housing required by the emerging RSS for Yorkshire and the Humber, it is considered that a combination of the aforementioned options would also provide a comprehensive housing strategy for the district. We would advocate that this process should consider the allocation of appropriate brownfield and Greenfield sites, to ensure the district's housing requirements can be achieved.</p>	<p>Giggleswick School (GVA)</p>
<p>We support enlargements to the main urban area of the district with urban extension sites (including use of safeguarded land). The identification and release of these sites is likely to be particularly important in meeting the housing needs of the main urban area of the district over the LDF period. PPS3 advises that sufficient sites needs should be identified to provide for a range of housing types, and therefore the focus should not be solely on central urban brownfield sites.</p>	<p>Hallam Land Management</p>
<p>The section on housing supply includes reference to the draft RSS housing requirement. It should be accepted that the precise housing requirement for <i>LPA</i> is not yet known, as the final version of the RSS has not been published. For this reason, there should be some in built flexibility in assumptions made now about future housing requirements for the long term in order to allow the strategy to deal with changing</p>	<p>Home Builders Federation</p>

<p>circumstances (PPS12 test of soundness ix at paragraph 4.24 of PPS12).</p> <p>Within this section, there is reference to windfall development. It should be noted that PPS3 states ‘allowance for windfalls should not be included in the first 10 years of land supply unless LPA’s can provide sufficient evidence of genuine local circumstances that prevent specific sites being identified’. It is considered important that in relation to this issue, the Core Strategy is in accordance with national planning advice as set out in PPS3.</p>	
<p>Housing should be focused across the city area and in derelict former industrial land, mills and warehouses across the city area (Option 1).</p>	<p>Ilkley Civic Society</p>
<p>Housing should be focused in the city centre, along the route of the proposed Canal and also by redeveloping underused land and buildings in the inner areas (Options 1 & 2).</p>	<p>Ilkley Parish Council</p>
<p>Topic Paper 3: Dwellings, of the Core Strategy Issues and Options states that the housing requirement for the District as set out in the Draft RSS increases figure is clearly a requirement that will have to inform and drive the proposed spatial strategy for the future, indeed there is a possibility that the requirement may further increase following the publication of the findings of the inspector into the RSS Examination later this month.</p> <p>The Core Strategy suggests a number of options to meet this increased housing requirement, including, increased development in the city centre Neighbourhood Development Areas, redevelopment of underused land, and potential of urban extensions. Whilst these options will deliver much needed housing in the urban areas which are to be the focus for retail, leisure and office development, the topic paper and evidence base demonstrate a need for housing in the smaller settlements. Indeed, the sustainability of housing development in relation to planned economic development in Airedale should be considered in accordance within national and regional planning policy to reduce the need to travel as discussed previously.</p> <p>Current UDP policies have adopted a phasing approach towards the current allocations in addition to a policy giving priority to previously developed sites. Whilst my client supports the principle that development of brownfield sites should take place preference to Greenfield sites, it is considered that this policy alone will not be sufficient to meet the future housing requirements, in addition to the identified backlog of housing requirements.</p> <p>My clients have an interest in an allocated phase two housing site at Chellow. Given the past housing trends</p>	<p>Keyland Developments Ltd</p>

<p>and the future requirements it is considered that these phase two sites, particularly those within Bradford, Shipley and Baildon should form the basis of the future housing provision in accordance with the proposed spatial strategy. The sites have already been tested by an inspector and have been found to be appropriate and sustainable for future housing growth and development. The distribution and size of these sites will, in addition to helping meet the housing requirements also help to meet the identified needs.</p>	
<p>Additional housing should be in accessible locations, or locations that can easily be made accessible in a financially sustainable manner (i.e. a new bus service will become commercially viable within a realistic timescale of a new development being built).</p>	Metro
<p>It is considered that the approach of urban concentration is the most appropriate.. The principle of focusing the majority of new housing and other development within and adjoining the city of Bradford will secure sustainable patterns of development and help facilitate fewer and shorter journeys, reducing reliance on the private car and increasing opportunities for walking and using alternative modes of transport. A combination of the following options is appropriate</p> <ol style="list-style-type: none"> 1.) Focusing development in the city centre neighbourhood development areas 2.) Redeveloping underused land and buildings in the inner areas 3.) Enlarging the main urban area with urban extension sites. Where urban extensions are required adjacent to the main urban area, it is considered that priority should be given to safeguarded land, as identified in the replacement UDP. <p>In respect of the option to allow the growth of peripheral towns and villages, this is considered to be inappropriate unless small scale extensions to settlement boundaries are genuinely required to meet local needs</p>	Miller Strategic Land
<p>The Topic Paper poses a number of suggested options, a combination of which would be appropriate.</p> <p>The Urban Capacity Study, when published later this year, will identify a significant but not inexhaustible supply of deliverable brownfield sites, which will be suitable to accommodate housing growth in the urban areas of the District. This, in the majority of cases, will be the most sustainable option for identifying sites and areas for growth.</p> <p>Significant housing numbers will be appropriate in the City Centre to support the urban regeneration objectives set out in the four Neighbourhood Development Areas and along the route of the Bradford Canal. However it would be a mistake if the Council relied on the City Centre too heavily to deliver housing sites as it is likely that much of the city centre housing will be high density apartments rather than family housing.</p>	Redrow Homes Ltd

<p>Ranges of housing sites are needed across the District to meet housing needs and suitable sites/areas for family housing and affordable housing must be identified.</p> <p>To fulfil the genuine housing needs of the District now and in the future it is necessary to understand where need and demand lies. For instance, in order to facilitate the regeneration objectives of the Airedale Corridors Masterplan it is a mistake to only plan for housing to meet local needs. The settlements in this corridor are likely to be transformed over the plan period into thriving economic hubs which must have sufficient high quality new housing in order to attract people to live and work there.</p> <p>In order to direct significant levels of housing growth to the urban areas it is likely that some, sustainable urban extension sites will have to be considered for release. These should include safeguarded land sites and potentially some limited greenbelt sites that perform well in terms of sustainability.</p> <p>Some of the smaller settlements, especially those in proximity to the main urban areas, well connected by public transport and those within the Airedale Corridor must be allowed to accommodate growth to provide housing choice. Again, this option must consider the potential for release of some, sustainable-safeguarded land sites and potentially greenbelt.</p>	
<p>We do not support the option of allowing peripheral towns and villages to enlarge by allowing use of the greenbelt – this could encourage the unsustainable sprawl of settlements surrounding urban areas. Core Strategy policy should direct housing development to sustainable locations with appropriate existing transport and community infrastructure (particularly public transport), and where impacts on the District’s biodiversity would be minimised.</p> <p>We note that there is likely to be additional housing demand within Airedale and to the east of Bradford. We agree with the Council it needs to ensure the <i>‘quality of the local environment and access to the green infrastructure is enhanced’</i>. This is a key strategic consideration for areas with development pressure – we encourage the Council to identify opportunities to create priority habitats in these areas (e.g. wetland habitats in Airedale) to contribute to sustainable, development that provides high-quality green infrastructure for both people and wildlife.</p> <p>High-density developments in urban areas have the potential to put considerable pressure on existing community infrastructure, including green space. Core Strategy policies should require new developments to create new community facilities, including wildlife rich green space, to meet additional needs, or contribute to</p>	<p>RSPB</p>

the enhancement of existing facilities.	
<p>The future development of Bradford must be balanced. We consider that it is extremely important that there is sufficient provision of housing supply for Bradford and that this is linked with the longer term economic development of the City and the wider District. Bradford District has experienced considerable economic growth in the past few years and is proposing growth in the future; therefore it is important that housing provision matches that growth. We support focusing development in or on the edge of the more sustainable towns in the District. Therefore, we support the options of <i>utilising safeguarded land and enlarging the main urban area.</i></p> <p>We support the production of an Urban Potential Study as part of the evidence base for the emerging Local Development Framework. However, we believe it is important to highlight that the sequential approach to identifying land, whereby brownfield is preferred to greenfield sites, established in PPG3 has not been transposed into the recently published PPS3. Therefore, the sequential approach to land allocation must not be set within the emerging Core Strategy. PPS3 recommends that 60 percent of new housing be accommodated on previously developed land. Therefore, it is recognised that some greenfield sites in sustainable locations will be accepted for development, such as sustainable Greenfield sites on the edge of urban areas. PPS3 also states that windfall sites cannot be counted or relied upon in the allocations. As such, we consider that it is important to reiterate that the new parameter for new housing land is deliverability.</p>	Taylor Woodrow Developments Ltd
<p>This question enquires as to how best to accommodate the additional housing requirement set out by the emerging RSS within the District. It is evident that no single measure identified in the topic paper will be appropriate in all situations and therefore a combination of measures are needed to satisfy all of the needs of the District and the local communities that live within it. We would suggest that the majority of the new development should therefore be directed to the main urban areas and urban extensions to these, but in order to provide a range and choice of housing sites and to meet local needs it is clear that there will continue to be a need to provide new housing land in settlements that are well connected to the main urban areas such as Queensbury.</p>	West Register Realisations Ltd
<p>We welcome the recognition (in par 2.8) that one of the key strategic issues in the draft RSS governing how Bradford should plan its housing delivery include that “the historic environment should inform the location of new development and local distinctiveness should be encouraged”</p>	West Yorkshire Archaeology Advisory Service (WYAAS)
<p>The Core Strategy should encourage the efficient use of land including the <i>re-use of brownfield land</i>, and development should be encouraged at an appropriate density. As such, <i>priority must be given to residential development on brownfield land in advance of Greenfield</i>, although <i>housing sites should</i></p>	Yorkshire Forward

<p><i>be located in sustainable locations, close to existing services and public transport links.</i></p> <p>We realise that over the period of the LDF local authorities and developers may have to seek land outside of urban centres, due to a shortage in suitable brownfield sites. In such cases, land should be chosen which is in the most sustainable locations, and where necessary developer contributions should be used to fund additional infrastructure capacity, to help ensure such locations are sustainable as possible</p>	
<p>It is pleasing to see that the options given provide an urban focus to development, however by allowing peripheral towns and villages to enlarge (including the use of safeguarded land and/or green belt would not be a feasible option).</p>	<p>Yorkshire and Humber Assembly</p>
<p>As set out above, a combination of <i>concentrating new housing development on brownfield land</i> within the main urban areas and areas where there is available infrastructure would provide a sustainable approach.</p>	<p>Yorkshire Water</p>
<p>HOUSE BUILDING IN BRADFORD</p>	
<p>Q 3.2 'HOW SHOULD THE COUNCIL ENSURE THAT ENOUGH DWELLINGS ARE BUILT IN THE RIGHT PLACES IN THE DISTRICT TO MEET LOCAL NEEDS IN A SUSTAINABLE MANNER MAKING MOST EFFECTIVE USE OF LAND AND BUILDINGS'</p>	
<p>The Airedale Masterplan is primarily an economic document although its proposals for the 3 towns of Keighley, Bingley and Shipley <i>support the development of town centre living</i> to create vibrant and sustainable urban centres and on previously developed sites well served by public transport.</p>	<p>Airedale Partnership</p>
<p>Arnold Laver is in support of the continued promotion of the trends of <i>conversions and of town and city living</i> as a way of increasing densities of residential development within Bradford and thus making the most effective use of land and buildings. They are in support of a targeted approach to density of development which promotes higher densities in locations well served by public transport and infrastructure (Option 2) and of promoting city/town living by ensuring there is enough opportunity to convert buildings (Option 4).</p> <p>Residential uses should be encouraged as part of mixed use developments, enabling people to live and work within close proximity, further promoting sustainable living; and residential development on previously developed sites in edge of centre locations should also be encouraged alongside an acknowledgment of the need for a range of types and sizes of dwellings to ensure genuinely sustainable communities are created.</p> <p>To increase densities in a sustainable manner, previously developed sites should be the first choice for the development of high density residential schemes. The contribution of other forms of development to the creation of genuinely mixed and sustainable communities should not, however, be overlooked.</p> <p>The Core Strategy should follow Government guidelines for the average development density of 38 units per hectare as a minimum within Bradford in order to ensure that the additional housing requirement is met within</p>	<p>Arnold Laver</p>

the plan period	
<p>We are against using safeguarded land and green belt for housing. As much development as possible should take place within easy reach of the town centres which offer a full range of shops and community facilities. It is encouraging to see the adaptation of existing buildings that has already taken place and hope that this will continue. So, as far as Baildon is concerned we think that by the time the housing sites included in the existing UDP and from the new windfall sites are completed there can and should be little room for further housing development in Baildon.</p>	Baildon Community Council
<p>Bolsterstone Plc is in support of the continued promotion of the trends of <i>conversions and of town and city living</i> as a way of increasing densities of residential development within Bradford and thus making the most effective use of land and buildings. They are in support of a targeted approach to density of development which promotes higher densities in locations well served by public transport and infrastructure (Option 2) and of promoting city/town living by ensuring there is enough opportunity to convert buildings (Option 4).</p> <p>Residential uses should be encouraged as part of mixed use developments, enabling people to live and work within close proximity, further promoting sustainable living. In addition, residential development on previously developed sites in edge of centre locations should be encouraged.</p> <p>To increase housing densities in a sustainable manner, previously developed sites should be the first choice for the development of high density residential schemes.</p> <p>The Core Strategy should follow Government guidelines for the average development density of 38 units per hectare as a minimum within Bradford in order to ensure that the additional housing requirement is met within the plan period. Bolsterstone are therefore in full support of promoting high density housing (50 units per hectare) on all sites (Option 1).</p>	Bolsterstone Plc

<p>The Location Strategy and the Urban Potential Study will both assist in ensuring that the right number, types and location of houses are provided. The four city centre Neighbourhood Development Frameworks identify a series of urban villages of different character, density and house types. This approach could be adopted elsewhere.</p> <p>Promoting high density housing on all sites (Option 1) should not be considered as it inflexible and will stall development, particularly in the smaller settlements. Only accepting developments making use of previously developed land or buildings (Option 3) is similarly rigid but there should be a presumption in favour of brownfield sites and conversions.</p> <p>Promoting higher densities in sustainable locations and promoting city and town living (Options 2 & 4) should be combined, and the market approach (Option 5) should only be examined further once an assessment of its impact is available.</p> <p>The plan must be flexible but not to the extent that it is undermined. The review process should allow for this.</p>	<p>Bradford Centre Regeneration</p>
<p>In responding to this question we firstly highlight to the Council that there is no reference to the preparation of a Strategic Housing Land Assessment (SHLA) or Strategic Housing Land Assessment (SHLA) or Strategic Housing Market Assessment (SHMA) within the discussion of the CSIO. PPS3 advises that a SHLA should be carried out in order to understand the scale of potential housing opportunities within the District and a SHMA to understand the need for housing in the District. In our view the most appropriate approach would be for the Council to work alongside developers to understand the housing market and its needs throughout the District.</p> <p>In meeting the housing requirement, we support the prioritisation of PDL, but recognise that given the abolishment of the sequential approach in PPS3, there are likely to be cases where deliverable and developable greenfield sites should be identified and released for housing. The release of such sites will be informed by the findings of the SHMA.</p>	<p>Commercial Estates Group</p>
<p>The Council should undertake a more detailed Housing Market Assessment for each market area to ensure housing supply is balanced. PPS3 warns against an over-reliance on windfalls. Net additions do not include replacement dwellings in housing renewal and regeneration areas.</p>	<p>Dacre, Son and Hartley</p>
<p>The location of housing should be determined whilst taking into account flood risk. Any areas of high risk zone 3 identified for housing should demonstrate through the sequential test would also require application of the Exceptions Test.</p>	<p>Environment Agency</p>
<p>Promotion of high density development (50 units to the hectare) on all sites</p>	<p>Giggleswick School</p>

<p>We would consider the imposition of a blanket target of 50 units per hectare for all housing developments across the district to be excessive. It is considered that in many cases this approach would create new developments out of character with their surroundings. It would also fail to cater for the diverse range of housing requirements within Bradford, and could potentially create an over supply of smaller 1-3 bedroom apartment/ dwellings within existing urban areas</p> <p>Accepting only developments making use of previously developed land or buildings</p> <p>In accordance with National Planning Policy statement 1: <i>Developing Sustainable Communities</i> (2005) the draft regional spatial strategy places a growing emphasis on the development of previously developed land. However, the draft RSS only targets 60% of new development on previously developed land in Bradford, which is comparatively low when compared to other urban districts in Yorkshire and the Humber. This is part in recognition that large areas of the Bradford Metropolitan District comprise of smaller towns and rural areas, where the availability of brownfield land is limited. A blanket restriction on non-brownfield development would therefore restrict these areas from accommodating sufficient housing to satisfy demand. This could also have an adverse affect of increasing house prices through a lack of supply and thereby exacerbating problems of affordability. In addition, the setting of a 100% target for previously developed land would contradict the RSS requirement, given its allowance for significant non-brownfield residential development. RSS will form part of the development plan and is therefore primary consideration.</p> <p>Promote the release of Greenfield sites in strong markets</p> <p>Although a wholesale market approach could potentially undermine regeneration efforts within inner areas, the release of suitable green field sites is considered necessary to cater for the district's housing needs. The increase in housing requirements set out in the draft RSS will place much greater pressure on previously developed land, with possible implications for employment land availability. Appropriate green field sites will therefore need to be brought forward to ensure additional housing can be accommodated across a broader area. In towns such as Ilkley, where there are limited opportunities for developing brownfield land, green field sites present the most appropriate source for new housing land</p>	
<p>We highlight to the council that there is no reference to the preparation of a strategic housing market assessment (SHMA) within the discussion of the CSIO. PPS3 advises that a SHMA should be carried out, with the council working alongside developers to understand the housing market and its needs. We offer support promoting <i>the release of Greenfield sites for housing in strong market areas to ensure a range and balance of quality housing can be provided</i> (Option 5). The release of such sites will be informed by the findings of the SHMA.</p>	Hallam Land Management
<p>PPS3 paragraph 47 states 'LPA's may wish to set out a range of densities across the plan area rather than one broad density range although 30 dwellings per hectare net should be used as a national indicative minimum to guide policy development and decision-making, <u>until local density policies are in place</u>'. The HBF</p>	Home Builders Federation

<p>supports the approach to allow LPA's to set density standards for their own area based on a number of criteria involving character assessment and accessibility to services.</p> <p>The requirement for the totality of development to be at a density of 30 – 50 dwellings per hectare must allow for some development at lower densities to enable the provision of a full range of housing.</p> <p><i>How much flexibility should there be in the Plan to ensure that it can respond to an under or over supply of homes?</i></p> <p>The most critical output of the planning system for the industry is land that is available for development or redevelopment of housing. This requirement is acknowledged in PPS3 paragraph 54 that states 'LPA's should identify sufficient specific <u>deliverable</u> sites to deliver housing in the first 5 years. To be considered deliverable, sites should be <u>available, suitable and achievable</u>.</p> <p>Paragraph 70 states 'where have an up to date five year supply of deliverable sites and applications come forward for sites that are allocated in the overall land supply, but which are not yet in the up to date five year supply, LPA's will need to consider whether granting planning permission would undermine achievement of their policy objectives'.</p> <p>Therefore, these issues should be considered when having regard to the question of response to an under or over supply of homes.</p>	
<p>Careful and regular assessment of need is necessary. The uniform 50 units/hectare is completely inappropriate as it does not take account of local distinctiveness and does not acknowledge the difference between city centre and isolated countryside settlements. A targeted approach of higher densities in more sustainable locations (Option 2) should be used to prevent speculative greenfield development i.e. allowing development elsewhere only when there is demonstrated need. We deplore 'garden grabbing' when it detracts from local distinctiveness and degrades an area by overwhelming the existing immediate infrastructure.</p> <p>The concept of a 'unit of housing' or a 'household' in this area is problematic. While a large number of people do live alone, there are many people living in extended families of several generations who require much larger houses. There are also a large number of houses only occupied part of the year due to people living/working away from the area. Such living patterns and their impact on infrastructure are probably not captured by censuses or questionnaires.</p>	<p>Ilkley Civic Society</p>
<p>In support of accepting housing developments which make use of previously developed land and buildings, but this should not include gardens (Option 3). City and town living should also be promoted (Option 4).</p>	<p>Ilkley Parish Council</p>
<p>Whilst the strategy aims to focus development on the regeneration of brownfield sites within the urban area,</p>	<p>Keyland Developments Ltd</p>

<p>the development of previously developed sites within the greenbelt should be considered for development prior to the release of greenfield sites in accordance with National and Regional Planning policy. National and Regional Policy state that maximum use should be made of brownfield sites with mixed use development on such sites supported.</p> <p>Given the above it is considered that both the increase in the housing requirement over the LDF period and the aim to enhance the economy in the urban areas and in Airedale, suggest that the sustainability of potential sites within the Airedale is an important factor in delivering the strategies vision and objectives. We consider that the Esholt area provides a sustainable location with good quality existing public transport links with proposals and opportunities for further improvements. The potential of mixed use development in this area and the potential to maximise brownfield sites would be in accordance with both National and Regional Planning policy.</p>	
<p>I favour a targeted approach to density.</p>	<p>Metro</p>
<p>High density housing is appropriate in locations that are well served by public transport, but this should be balanced against the need to provide a range of house types, including some large, lower density housing. In accordance with the guidance in PPS3, it is considered that a density of 30 dwellings per hectare net should be used as a minimum.</p> <p>It is not appropriate to only bring forward development that makes use of previously developed land. The re-use of previously developed land does not always represent the most sustainable option or make the most efficient use of resources. Although it is accepted that some priority should be given to the use of sustainable previously developed sites, there are circumstances where the release of Greenfield land, including urban extensions, results in the most sustainable patterns of development (Option 5). Placing too much emphasis on the use of previously developed land could result in a tension with the principle of urban concentration, which is the most effective way of reducing greenhouse gases and making efficient use of resources. Furthermore, the over reliance on potentially constrained previously developed sites could result in the authority failing to identify 'deliverable' land for development. This would cause conflict with the approach to delivering a flexible supply of housing as advocated by PPS3. The principle of city/ town living and the conversion of existing buildings to residential use, where they are no longer required to in connection with other uses, is broadly supported. However, although conversions can be a useful source of new housing there are limited opportunities for such development and this option will only deliver a small proportion of the overall housing requirements. The 'market approach option', which would result in the release of Greenfield land in strong market areas is not considered to be appropriate as it would undermine the principle of urban concentration and the wider planning objective of delivering sustainable patterns of development.</p>	<p>Miller Strategic Land</p>

<p>Use of green belt land for further development would not only harm the natural heritage, but impose great strains on the existing infrastructure of roads, public transport etc. there is little evidence that that developers would contribute to improving the infrastructure. We can not support the option of relaxing green belt status in order to satisfy additional housing needs in the Bradford area.</p>	<p>Oxenhope Parish Council</p>
<p>Brownfield sites are not absorbing the large housing need, therefore Greenfield sites must be identified for a change in designation around all existing areas of population (Option 5). No one wants to see green spaces disappear, but we are blessed with a great deal of open country and only a tiny amount is required for development.</p>	<p>Patchett Homes</p>
<p>We are very concerned that the Green Belt might be compromised to accommodate growth in population. We strongly support the options of redeveloping underused land, and focusing development in existing urban land, but we do not support the use of Green Belt, nor of extensive use of greenfield land sites.</p> <p>Bradford's Green Belt area is in reality inadequately defined but inhabitants tend to have an assumption as to its boundaries and a strong desire to protect it. We have reservations about the suggestion made in the Barker Review of Land Use Policy of exchanging pockets of existing Green Belt for others not currently classed as such. This seriously undermines the quality considerations of the existing Green Belt.</p>	<p>Ramblers Association</p>
<p>The Council should use the results of the Urban Capacity Study to identify what supply of suitable, available and deliverable urban sites exist to accommodate the strategic housing requirement set out in RSS. They should also analyse evidence of current and future levels of need and demand for housing in each settlement. It is also critical that the Council do not place too much emphasis on allowing high density apartments in the City Centre to dominate the source of supply and plan for family housing needs across the District. The Council must also not discount the option of considering greenfield sites at the edge of the urban areas for release. This will naturally include safeguarded land sites and some limited number of greenbelt sites (Option 5).</p> <p>The Council should plan for allowing high density housing in appropriate, sustainable locations such as sites in the City Centre, the town centres and those in proximity to good public transport links (Options2 & 4).</p> <p>It would be a mistake; however, to only allow developments making use of previously developed land as this would be likely to stifle supply. RSS sets a target for 60% of all new housing to be provided on previously developed sites; this clearly recognises the importance of allowing for a significant proportion of new housing to be built on greenfield sites.</p>	<p>Redrow Homes</p>

<p>The production of a Housing Market Assessment will identify the broad issues and locations of need in the District. This will ensure that the Council are aware of the local needs in particular areas, as such this will focus the types and size of developments when they are brought forward. Therefore, we do not believe that promoting only city/town higher density living is a sustainable way forward and will certainly not ensure dwellings are built in the right places. The vision is about balanced growth throughout the District and therefore focusing only on urban areas will promote unbalanced development in favour of city/towns. In accordance with PPS7 and PPS3 there is a need for some rural growth in sustainable locations. Furthermore, accepting only developments that make use of Previously Developed Land would not be in accordance with PPS3, or with the RSS which sets a PDL target of 60 percent for Bradford. Nevertheless, we <i>support increasing densities in highly accessible locations such as around transport hubs and promoting the use of greenfield sites, however this should not just be in strong market areas. Greenfield developments can be appropriate in weaker areas as they encourage inward investment.</i></p>	<p>Taylor Woodrow</p>
<p>This question refers to the need to ensure that enough dwellings are provided in the right places to meet local needs in a sustainable manner. It is our view that this is a crucial matter. Targeting new development to previously developed land in the main urban areas and promoting higher density development on such sites will not meet all of Bradford’s housing needs. Rather, and the best way, if not the only way, to ensure that that this issues is satisfied is by allocating sufficient land in appropriate locations. It is also plain that due to the changing nature of the housing market and government guidance, which often varies over time it is important that Bradford adopt an approach that allows flexibility to respond to the under or over supply of homes. Therefore sufficient housing and safeguarded land allocations must be made throughout the District and this should be combined with a policy for the phased release of housing sites.</p>	<p>West Register Realisation Ltd</p>
<p>We consider that new housing should be located in the <i>most accessible and sustainable urban areas, close to existing employment opportunities and local services and facilities, including public transport services.</i> It is important that proposals for new housing help achieve the overarching objectives of creating mixed and sustainable communities, making the most efficient use of land, reducing the need to travel and encouraging the use of sustainable modes of transport</p>	<p>Yorkshire Forward</p>

AFFORDABILITY	
Q 3.3 'HOW SHOULD THE NEEDS OF ALL SECTIONS OF THE COMMUNITY FOR A DECENT AFFORDABLE DWELLING BE MET?'	
The Council should adopt a flexible approach in seeking affordable housing within the Plan area, and encourage a range of types of affordable dwellings appropriate to the community. The range of affordable housing types should dwellings of different size and tenure in accordance with PPS3 and provide social rented housing as well as private homes below market price, to include shared equity and key worker homes.	Arnold Laver and Bolsterstone Plc
We agree that there is a great need for affordable housing which should be done through <i>lowering the site size threshold</i> in which affordable housing is expected and to <i>allocate some sites specifically for affordable housing</i> . Affordable housing in areas like Wharfedale seems to present a considerable problem as affordable houses rapidly become unaffordable in perpetuity as prices continue to rise. The council may be able to work out how this difficulty may be overcome	Baildon Community Council
Views on affordable housing were spelt out in a January submission and will not be repeated here. Nonetheless, the Plan should allow for a far greater contribution by Registered Social Landlords.	Bradford Centre Regeneration
We are disappointed that there is so little emphasis on affordable housing. <i>The threshold for development needs to be significantly lowered</i> , particularly on windfall sites from the present 25 units to something like 10 or less	Ben Rhydding Action Group
PPS3 confirms that affordable housing requirement must be informed by a SHMA. We offer support for the lowering of site size threshold (2 nd bullet) and requiring affordable provision related to need in the market area (4 th bullet point) to ensure supply is provided where it is needed most.	Commercial Estates Ltd
The answer to this requires a robust and up to date evidence base on housing needs as part of a Housing Market Assessment.	Dacre, Son and Hartley
PPS3 confirms that affordable housing requirement must be informed by a SHMA. We offer <i>support for the lowering of site size threshold</i> (Option 2) and <i>requiring affordable provision related to need in the market area</i> (Option 4) to ensure supply is provided where it is needed most.	Hallam Land Management
The issue of affordable housing cannot be divorced from consideration of the issue of overall supply. If	Home Builders Federation

<p>housing requirements are set at rates lower than the need and demand for new housing then it should not be a surprise to anyone that the affordability of housing in relation to local incomes is worsening.</p> <p>In seeking to determine what is an appropriate policy approach to securing affordable housing provision, consideration has to be given to the effects on overall housing supply. Particularly the viability of development sites which is a key theme of PPS3. Setting a higher percentage target or lower site size threshold is wholly counter productive if that target / threshold impacts on development viability and so prevents sites coming forward. Or, if achieving that target means compromising so heavily on other policy objectives and planning obligation requirements that the overall quality of development is adversely affected.</p> <p>One sensible way forward is to adopt a cascade approach to both target percentages and site size thresholds but even that must be viewed in the context described above. The Council should also give consideration to a cascade of tenure. The funding of affordable housing will be a key issue in the future. The old distinction between market and social rented housing is no longer appropriate and there are a number of forms of intermediate housing which meet the affordable housing policy objectives as well as being required in order to create sustainable, mixed and balanced communities.</p> <p>In relation to affordable housing provision, proper and full regard must be had to the overall viability of schemes in setting any requirements. It should be remembered that in order to make housing more affordable, there needs to be more housing built in total. There should also be a flexible approach to the delivery of any affordable housing requirement, taking on board whether or not public grant funding is available. If not, then an alternative approach/requirement has to be properly considered.</p> <p>Affordable housing requirements must not be so onerous that they threaten the delivery of the Council's overall housing requirement. The Council has to consider a vital matter that, the very fact that thresholds are lowered is likely to reduce the supply of smaller sites coming to the market. Clearly any lower thresholds set will need to both comply with national guidance, and also be properly backed up by a sound evidence base.</p>	
<p>Lowering the site size threshold and allocating large sites for housing which encourage mixed tenures on one site will be the best approaches (Options 2& 4).</p>	<p>Ilkley Civic Society</p>
<p>Lowering the site size threshold is especially important, as well as allocating large sites which encourage a mix of tenure.</p>	<p>Ilkley Parish Council</p>

<p>I favour the option outlining different percentages based on market area and need.</p>	<p>Metro</p>
<p>Allocating sites specifically for affordable housing in all parts of the District where there is need is not considered to be a realistic option. In general terms, affordable housing can only be delivered where there is cross subsidy from market housing. On this basis, the most effective way of securing affordable units by requiring that an appropriate proportion of a wider development is released as affordable housing which should be negotiable on a scheme by scheme basis and directly linked to proven need and site specific circumstances.</p> <p>The replacement UDP generally requires a proportion of affordable housing on all sites above 1 hectare or yielding 25 dwellings or more. It is considered that it would only be justifiable to lower the threshold in smaller settlements, where there is clear evidence of local need.</p> <p>As a broad principle, it is considered that the allocation of large sites will allow the opportunity for mixed tenures and the delivery of affordable housing. The option to require sites to make provision in accordance with a percentage based on the market area and need (which would promote a higher requirement in areas of highest need) is not supported. This rigid approach could potentially undermine the viability of certain developments and affect the delivery of both market and affordable housing.</p>	<p>Miller Strategic Land</p>
<p>The rate of increase in the price of housing will only come down if more land is released for development.</p>	<p>Patchett Homes</p>
<p>Allocating a small number of sites specifically for affordable housing should be discouraged and could lead to the creation of stigmatised sink estates. Different sites should make provision for affordable housing in relation to a percentage based on market area and need which promotes a higher requirement in areas of highest need. However there will be instances where, due to significant abnormal costs associated with site delivery, developers will need to negotiate an appropriate affordable housing contribution below the policy requirement. Clear guidance should be provided by the LPA setting out when and how a lower level of affordable housing can be provided. In some cases it will also be more appropriate for developers to make a financial contribution to the LPA, in lieu of on-site affordable housing provision. Again, the LPA should provide clear guidance on circumstances where this approach is likely to be acceptable.</p> <p>The LPA should be careful not to stifle development by setting the required percentage contributions too high.</p>	<p>Redrow Homes Ltd</p>

<p>The LPA will note the PPS3 definition of affordable housing does not include low cost market housing unless there is a mechanism for retaining the properties as affordable ‘in perpetuity’, for example through management by a RSL. A number of house builders, including Redrow, are now providing a low cost market housing product aimed at first time buyers. Rather than being subsidised this housing are less expensive simply due to their size and economic construction method. Although these houses are privately owned and occupied the market will dictate that they will remain low cost and hence can make an invaluable contribution to meeting the affordable housing needs of the community. The LPA should consider applying their definition of affordable housing with flexibility to encourage low cost market housing developments such as Debut by Redrow.</p>	
<p>The section does not make specific reference to the Council’s Housing Market Assessment, which is being prepared. As mentioned earlier, the Issues and Option consultation must be fully evidence based. The Housing Market Assessment will assist in understanding the level of affordable housing need and where it is required.</p> <p>PPS3 sets out the Government’s key housing policy goals which are to achieve a wide choice of high quality homes, to widen opportunities for home ownership, to improve affordability and to create sustainable, inclusive, mixed communities in all areas, both urban and rural. These must be taken into account in the preparation of the Core Strategy</p> <p>We are concerned that one of the potential options refers to allocating entire sites for affordable housing. We believe that any affordable housing policy should accord with Government policy of making inclusive, mixed, sustainable communities. Therefore we promote the option that affordable housing thresholds be determined on a site by site basis taking into account the requirements of the area, site, financial and market considerations.</p>	<p>Taylor Woodrow Developments Ltd</p>
<p>We would welcome a variable level for affordable housing provision, informed by the housing needs survey to determine the level of affordable housing required for specific areas in the district. Therefore, in areas determined to have a high need for affordable housing, developers should be encouraged to provide a level of affordable housing that will meet the needs of local people, but not to make new developments unviable.</p> <p>Developers should be encouraged to provide mixed tenure housing, thus allowing social registered landlords and housing properties at a discounted rate to those in need, or priced out of the housing market. Developers should be encouraged to provide an appropriate mix of market housing to help meet a range of housing needs. As providing a range of will help sustain the economic renaissance of the district.</p>	<p>Yorkshire Forward</p>

<p>We are pleased to see the issue of affordable housing covered in the Issues and Options document. As the Council prepares the Core Strategy it will obviously be able to take into account the Local Housing Assessment (referred to on page 5). Draft RSS (2004) Policy H3 advises local authorities to seek less than 29% affordable housing on developments of more than 15 homes in areas of low need, of which Bradford is one. However, the Assembly recognises that different markets lead to a higher need for affordable housing in some parts of the district. Policy in the emerging RSS gives local Planning Authorities the discretion to vary targets within the Plan area.</p>	<p>Yorkshire and Humber Assembly</p>
<p>LOCAL ISSUES AND CONSIDERATIONS</p>	
<p>QUESTION 3.4: HOW CAN THE CORRECT BALANCE OF HOUSE BUILDING AND CREATION OF NEW DWELLINGS IN THE DISTRICT IN TERMS OF TYPE AND SIZE BE ACHIEVED?</p>	
<p>Again PPS3 confirms that housing type and size should be informed by SHMA. We advise against house types and tenures being overly prescriptive in order to enable developers to respond to market requirements.</p>	<p>Commercial Estates</p>
<p>The answer to this will come from a proper Housing Market Assessment. A more detailed trajectory of affordable housing supply in current and future permissions should form part of this evidence base.</p>	<p>Dacre, Son and Hartley</p>
<p>PPS3 confirms that housing type and size should be informed by SHMA. We advise against house types and tenures being overly prescriptive in order to enable developers to respond to market requirements.</p>	<p>Hallam Land Management</p>
<p>HBF is concerned that a LPA will dictate the provision of a mix of dwelling types in new developments in all cases and this will not be appropriate. Achieving mixed communities does not mean that all areas have to have the same mix of dwelling types. All areas are different, all housing markets are different and this needs to be considered on a sub-regional scale. Different areas perform different functions and this is often largely as a result of the housing mix in an area. The market assessment needs to consider the issue of complementarity between areas.</p> <p>PPS3 advice could be interpreted to allow LPAs to dictate the mix of dwellings on all sites, which the HBF objects to. In reference to this issue, PPS3 paragraph 24 should also be taken into account. This states, 'LPAs should ensure that the proposed mix of housing on <u>large strategic sites</u> reflects the proportions of households that require market or affordable housing and achieves a mix of households as well as a mix of tenure and price. <u>For smaller sites</u>, the mix of housing should contribute to the creation of mixed communities having regard to the proportions of households that require market or affordable housing and the existing mix</p>	<p>Home Builders Federation</p>

of housing in the locality’.	
It should be through a combination <i>defining density on a site by site basis, drawing up site briefs for each site, and asking developers to submit detailed analysis and reasoning on the type and style of the proposal</i> (Options 2, 3 & 4).	Ilkley Civic Society
This should be done through <i>defining densities on a site by site basis and asking developers to submit detailed analysis on the development</i> (Options 3 & 4)	Ilkley Parish Council
I would recommend drawing up site briefs for developments above a certain size, otherwise based on area.	Metro
A robust and up to date evidence base, including detailed demographic profiles: housing market assessments and other evidence, is required to inform policies and development control decisions. In accordance with the guidance provided in PPS3, when planning at site level, developers should bring forward proposals that broadly reflect demand and the profile of households requiring housing. This should support the creation of mixed communities. Although most housebuilders will have a sound understanding of the housing market, it is essential that local authorities undertake regular housing market assessments to guide development.	Miller Strategic Land
The market should be allowed to decide on the type of housing we require. The developers know the demand and will try to satisfy the need. Be radical and consider development as something to be embraced and welcomed	Patchett Homes
The LPA must pay regard to the evidence of household formation in the form of household projection figures. The 2004 based projections have been published very recently. This shows the declining contribution of married couple households and the growth of single person and lone parent households. The result is a falling average household size. The LPA must plan for balanced communities where new housing developments include a mix of dwelling types and tenures accommodating a range of needs. The LPA should utilise housing market assessments to inform where and what types of dwellings are needed. Developers can then use this in order to make a case for the type and style of proposed developments. In an ageing population, the LPA should make special provision for the needs of elderly people by planning for sheltered accommodation in the most sustainable locations.	Redrow Homes Ltd

<p>It is important that the quality and type of development is emphasised rather than the quantity of new housing. PPS3 states in paragraph 12 that “good design is fundamental to the development of high quality new housing, which contributes to the creation of sustainable, mixed communities”. New development should therefore achieve a wide choice of high quality homes that addresses the requirements of the community. Therefore, there are significant issues regarding the continuation of meeting the housing requirement through high density developments. PPS3 states that the Housing Market Assessment should outline the likely profile of market housing.</p> <p>Nevertheless, although Housing Market Assessments can consider the broad issues of housing mix, the LDF should not seek to control the housing mix across the District on a site by site basis. It is both unnecessary and inflexible to seek to control the housing mix on sites, since it would mean the housing market would be unable to adjust to market movements. Similarly, we believe that densities on specific sites should not be explicitly controlled through the LDF, as this would be restrictive and inflexible. However, <i>we do support the use of development briefs for significant allocations.</i></p>	<p>Taylor Woodrow Developments Ltd</p>
<p>This question seeks to address the issues of providing the correct level of holding building and creation of new dwellings in terms of type and size. It is now mandatory to provide a design and access statement with all planning applications and with such a document we would fully expect the LPA to require a developer to justify the range of house types and sizes proposed and how they meet local housing needs. If this is backed up by a policy requiring developers to provide a range and choice of houses to meet identified needs then it is our view that this would provide a robust approach to the issue.</p>	<p>West Register Realisations Ltd</p>
<p>The completion of regular housing needs surveys is the best method for identifying what types of developments are needed in specific locations. Bradford MBC should produce regular housing needs survey documents to help determine the types of housing required in specific locations and the level of affordable housing required</p>	<p>Yorkshire Forward</p>
<p>It would be helpful to also include a reference to the work recently undertaken across the region into provision of sites for Gypsies and Travellers. Circular 1/2006 gypsies and Travellers refers to the RSS strategic role in determining distribution of additional pitches. Sheffield Hallam University produced an interim regional assessment that informed the debate at the Examination in Public. More recently Communities and Local Government has issued practice guidance on preparing the strategic regional overview on pitches. The Sheffield Hallam study should form part of the evidence base. Policy H5 of draft RSS identifies the need for local authorities to undertake a local assessment of the housing needs of Gypsies and Travellers, the results of which should feed into the reparation of local development frameworks.</p>	<p>Yorkshire and Humber Assembly</p>

LOCAL STRATEGIC CONSIDERATIONS	
Q 3.5 'TO WHAT DEGREE SHOULD LAND CURRENTLY OR PREVIOUSLY USED FOR EMPLOYMENT PURPOSES BE CONSIDERED FOR HOUSING REDEVELOPMENT?'	
<p>We suggests the re-allocation of the Motel site on main street, Addingham on green belt to brown belt status. As you are aware, this site was once the village garage and petrol station, so had industrial usage. When it was demolished some 20 years ago, the motel was proposed and planning permission given. No work had really been done to progress the site in this direction. A housing development plan was put forward some six years ago and refused on the grounds that the site had bee re-designated as green belt. If the site could be re-designated as brown belt we would support a housing development plan</p>	Addingham Parish Council
<p>In general housing development should be focused on the City Centre and Bradford Canal Corridor and within the existing urban areas. However, it is important that residential development does not 'push out' employment uses in the urban centres. With changes in the economy and the nature of employment, <i>mixed use developments which include the opportunity to live and work and create sustainable communities should be encouraged.</i></p>	Airedale Partnership

<p>Arnold Laver recommend that land currently or previously used for employment purposes be considered for housing redevelopment. The Core Strategy should continue the encouragement of residential development in the mixed use areas drawn from areas formerly protected for employment use, as promoted by the existing RUDP. Mixed-use developments should be situated within sustainable locations in the city or within easy public transport access of the City Centre and public transport nodes. Arnold Laver are therefore in full support of the following Option 2 - areas should be de classified to allow housing use such as mixed use areas where possible.</p>	<p>Arnold Laver</p>
<p>Whilst we have no objections with conversion of redundant city centre commercial buildings (i.e. mills) into residential properties, we must acknowledge that this change means that these buildings will never return to their original use (i.e. valuable manufacturing space is lost forever, and with it the opportunity to create/utilise future employment opportunities).</p>	<p>Bradford District Chamber of Trade</p>
<p>Bolsterstone recommend that land currently or previously used for employment purposes to be considered for housing redevelopment. The Core Strategy should continue the encouragement of residential development in the mixed use areas drawn from areas formally protected for employment use, as promoted by the existing RUDP. Mixed use developments should be situated within sustainable locations in Bradford City Centre or within easy walking distance of the City Centre. Bolsterstone are therefore in full support of Option 2 - areas should be de classified to allow housing use such as mixed use areas where possible.</p>	<p>Bolsterstone Plc</p>
<p>While PPS3 encourages the re-use of brownfield sites, the Council needs to take a careful and balanced approach to releasing employment or mixed use sites for housing. Bradford City and its main urban areas are not blessed with the most attractive outlook and encouraging higher density development in these areas without introducing green space would only further harm the image of the District.</p>	<p>Dacre, Son and Hartley</p>
<p>Transferring employment land in zone 3 to housing may not be prudent due to the flood risk (and also that the Exception test would need to be applied even where such sites are shown to be sequentially preferable) to meet the requirements of PPS25. This should be taken into account in any consideration of transfers. Additionally, some employment sites may be classified as 'highly or more vulnerable', please refer to table D2 of PPS25 for more information.</p>	<p>Environment Agency</p>
<p>Government policy requires the best use to be made of development land. PPS3 (paragraph 44) specifically advises local authorities to take a realistic view of the amount and type of land likely to be required to meet economic demands and, if land is identified or allocated for employment use over and above likely future</p>	<p>Home Builders Federation</p>

<p>demand, serious consideration should be given to allowing those sites to be developed for other uses. On that basis, HBF suggests that the most appropriate approach would be one that sought to identify (with full justification) key employment sites and allocations that should be protected.</p> <p>Then, for all non-key employment sites there should be a criteria based policy which sets out what factors will be taken into consideration in determining whether or not a site should be released for an alternative form of development. These factors should incorporate assessments of viability, demand, need, obsolescence, suitability for employment versus non-employment use and so on. It is not just rundown employment space that could be allowed to be lost to other uses but any non-key site where there is no longer a demand for continued employment use or where such a use is incompatible with its location</p>	
<p>Some sites could be declassified to allow for residential development, but new employment sites should be allocated to offset this loss (a combination of Options 2 & 3), but subject to an analysis of the need for employment and the possibility of creating a facility within a reasonable travel distance.</p>	<p>Ilkley Civic Society</p>
<p>Ilkley has few employment sites so should definitely want to retain if not moderately increase.</p>	<p>Ilkley Parish Council</p>
<p>If land currently allocated/classified as employment is inaccessible and vacant and it is not feasible to make the site accessible then it should be declassified and consideration should be given to an appropriate use. This should include grassing over and turning into recreation/leisure and/or farming land if it is impracticable to make the site accessible. Not all land and buildings currently protected should continue to be protected..</p>	<p>Metro</p>
<p>It is generally accepted that the redevelopment of vacant and underused employment sites or the conversion of unused industrial buildings can make a useful contribution to housing supply. However, a careful and balanced approach should be taken to the release of such land for housing.</p> <p>In broad terms, the overriding planning objective is to secure sustainable patterns of development but this could be undermined if too much traditional employment land is released for housing, forcing industry and employment generating development out of the urban areas. PPS3 only requires local planning authorities to consider whether any industrial or commercial sites would be better suited for housing development. The re-allocation of employment sites is not intended as an answer to housing and land supply shortages. Notwithstanding this, it is acknowledged that the growth sectors of the economy are changing and these new growth sectors may have different locational requirements to the older manufacturing sectors</p> <p>There should be a broad presumption against the release of employment sites for housing, unless it can be demonstrated that the land and building are genuinely surplus to employment requirements, or where there is special justification for the release of land, such land use conflicts or that the employment activity has different locational requirements</p> <p>Where mixed use development can be accommodated and new housing can be introduced into industrial</p>	<p>Miller Strategic Land</p>

<p>areas, without causing unacceptable use conflicts, this approach is supported in broad terms</p> <p>The purpose of reviewing employment land allocations and assessing their potential for housing development is to ensure that land is being used efficiently. However, if new opportunities for employment are needed as a direct result of releasing land for housing, this undermines this objective.</p>	
<p>A significant supply of land in the District is currently allocated for employment uses but may be better suited to residential use. Such sites will be considered in the Urban Capacity Study and as a result their development plan status may change. However sufficient sites must be retained for employment use in order to meet the strategic requirement for development of employment land. Any proposed changes to employment allocations should be supported by an assessment of the impact on the overall employment land supply.</p> <p><i>Only those employment sites in sustainable locations in mixed or predominantly residential areas should be considered suitable for residential use.</i></p>	Redrow Homes Ltd
<p>This could conflict with the key strategic issue mentioned in par 2.8 which talks about how Bradford should plan its housing delivery by acknowledging the historic environment. The older industrial areas in CBMDC contain buildings which are either historically valuable or contribute to the wider local significance. Re-using these buildings for housing development should not prove impossible subject to sensitive design considerations, adequate assessment and evaluation of the historic nature of the structures (which may include ancillary buildings not so suited for housing conversion).</p>	West Yorkshire Archaeology Advisory Service (WYAAS)
<p>We consider that employment land should only be reallocated for housing where the sites are determined to have limited future employment value and are located in sustainable locations. However, it is essential that sufficient levels of employment land are retained within Bradford to enable 'significant economic growth' to be delivered. Retaining an appropriate supply of employment land for office uses is particularly important as the RSS predicts growing demand for such forms of development within the region.</p>	Yorkshire Forward
<p>Yorkshire Water forecasts the population for each of its Waste Water Treatment Works to guide our capital programme and make informed decisions on where capacity needs to be increased. This information is based on land allocated for housing in the adopted UDP and sites with planning permission at the time of the forecast. If employment land was to be used for housing it should be noted that it will not have been accounted for and therefore, if the population equivalent is higher than that for a residential development, capacity at the works may not be available and developer contributions could be sought.</p>	Yorkshire Water
Q.3.6: WHAT ROLE DO THE SMALLER SETTLEMENTS HAVE IN DELIVERING HOUSING GROWTH?	
<p>We are against the policy to allow peripheral towns and villages to enlarge by eating into green belt space.</p>	Bradford Ornithological

This should be a last resort. Otherwise nature will continue to be pushed out of our district and villages merged into one another creating in reality, towns.	Group
These settlements can play a vital part in delivering much needed housing. We recommend the Council considers allocating small sites in each settlement where the opportunity for affordable housing can be delivered in a co-ordinated manner.	Dacre, Son and Hartley
Smaller sites can provide occasional windfall housing e.g. through subdivision.	Ilkley Civic Society
Through windfall sites	Ilkley Parish Council
The emphasis in smaller settlements should be on affordable and/or in-fill housing development.	
Q 3.7: SHOULD THE LEVEL OF AVAILABILITY IN SERVICES AND FACILITIES BE ADDRESSED BEFORE FURTHER HOUSING IS PLANNED, OR EXPANDED LATER?	
Yes. This applies to all parts of the District. We are concerned that the drive towards City Centre and urban regeneration will not be matched by essential education, health and other community facilities. We request an educational capacity audit be produced on a ward-by-ward basis for the evidence base.	Dacre, Son and Hartley
This needs careful planning. There is no point in building a large number of family homes at a particular site if there is no possibility of getting young children, unable to travel unaccompanied, to the same school, due to lack of capacity.	Ilkley Civic Society
The level of availability in services and facilities should be addressed before further housing is planned.	Ilkley Parish Council
Before	Metro
In some parts of the District, where infrastructure is deemed to be currently insufficient, land is safeguarded for future residential use after infrastructure has been improved. However, where the necessary infrastructure improvements have not been identified and solutions suggested to remedy the deficiency, this is a counter productive strategy. Safeguarded land around the edges of the urban areas can make a significant positive contribution to meeting housing needs and their release could be facilitated by adopting a more positive approach to planning whereby new housing is used as catalyst for wider infrastructure improvements such as new shops, school places and bus services.	Redrow Homes Ltd
The level of services and facilities should be a key consideration in the location of housing. It is essential that housing and facilities are co-ordinated to make sustainable communities	Yorkshire Water
Q 3.8: SHOULD THE LDF INTERVENE IN AREAS OF SIGNIFICANT AFFORDABILITY PROBLEMS?	
Yes. See PPS3 paragraph 2.3	Dacre, Son and Hartley
Yes – by imposing a transparent system of commuted sums.	Ilkley Civic Society

No- market forces	Ilkley Parish Council
Yes	Metro
3.9: WHAT APPROACH SHOULD THE LDF ADOPT IN AREAS OF LOW DEMAND OR LOW MARKET CONFIDENCE?	
The LDF should avoid high density development in these areas.	Dacre, Son and Hartley
Ask the questions as to what underlies low demand.	Ilkley Civic Society
Regenerate to raise confidence	Ilkley Parish Council
BMDC should encourage an appropriate housing mix and densities and should plan for facilities to be included (e.g. through pooled S06 contributions).	Metro
3.10 SHOULD BRADFORD ALWAYS GIVE PRIORITY TO HOUSING DEVELOPMENTS ON PREVIOUSLY DEVELOPED LAND AND CONTINUE TO PRESS FOR HIGHER DENSITIES?	
The emerging RSS seeks to locate new residential development on previously developed sites located in sustainable locations within the City Centre. It is considered that the Core Strategy should follow this approach and should accord with Government guidance for residential developments on previously developed sites to have an average development density of 38 units per hectare as a minimum, to ensure that the additional housing requirement is met within the plan period.	Arnold Laver
The emerging RSS seeks to locate new residential development on previously developed sites located in sustainable locations within the City Centre. It is considered that the Core Strategy should follow this approach and should accord with Government guidance for residential developments on previously developed sites to have an average development density of 38 units per hectare as a minimum, to ensure that the additional housing requirement is met within the plan period. <i>Bolsterstone are therefore in full support of priority to be given to high density housing development on previously developed land.</i>	Bolsterstone Plc
As stated in our response to Question 3.2, we offer support for the redevelopment of previously developed land, but highlight that under PPS3, there are likely to be circumstances where greenfield sites present opportunities to provide deliverable and developable housing opportunities.	Commercial Estates Group
No. Bradford is currently under-supplying housing at a rate of 700 units per annum. The Council needs to take a more realistic approach to delivery of housing and household aspirations.	Dacre, Son and Hartley

Reuse of brownfield sites can lead to their decontamination and remediation. As such, we would support the use of brownfield sites where this is compatible with other planning criteria.	Environment Agency
We highlight that PPS3 removes the sequential approach to the identification and release of housing land that was present in its predecessor PPG3. This means that there is no longer a national policy requirement to rule out all previously developed sources of housing supply before a particular Greenfield site can be allocated, or indeed released for housing. Rather PPS3 also places the emphasis on the key tests of deliverability and developability. The topic paper recognises that population densities in the district are significantly in excess of the national figure. We therefore suggest that there is a need to identify appropriate new housing sites in the LDF to allow those who aspire to move up in the housing ladder to lower density housing locations the opportunity to do so. Furthermore, the high density agenda of PPS3 has also been watered down in PPS3. PPS3 advises local planning authorities to set their own local density standards to reflect the character of particular areas.	Hallam Land Management
Depends on the site and other criteria	Ilkley Civic Society
Yes, but no to high density if out of character	Ilkley Parish Council
Not as a blanket policy, it depends on the other land use requirements in the area, e.g. employment and green/open space.	Metro
Q3.11 HOW BEST CAN ADDITIONAL HOUSING NEEDS IN THE MAIN URBAN AREA AND THE NEEDS OF SMALLER SETTLEMENTS BE ACCOMMODATED IN THE DISTRICT?	
We offer support for ensuring that the longer-term development needs of all settlements within the District are met. We feel that the most sustainable option in this case is to develop existing sites within the RUDP's settlement limits in order to minimise the need to expand outwards.	Commercial Estates Group
Undertake a Housing Market Assessment.	Dacre, Son and Hartley
We offer support for the focusing of new housing development to main urban area of the city, providing a range of sites including expansion to reflect the housing needs of a SHMA and PPS3's deliverability tests.	Hallam Land Management
Through consensus and proper consultation and involvement of local people in the planning process, Difficult, because it is complex, legal, time consuming and broadly misunderstood as a process.	Ilkley Civic Society
Through local consultation	Ilkley Parish Council
Through accessibility criteria	Metro

<p>ADDITIONAL Q ‘ HOW MUCH FLEXIBILITY SHOULD THERE BE IN THE PLAN TO ENSURE THAT IT CAN RESPOND TO AN OVER OR UNDER SUPPLY OF HOMES?</p>	
<p>On this matter we note the advice of PPS3 at paragraph 63 which advises Local Planning Authorities to set out an acceptable range of housing delivery, relative to the requirement. Paragraph 64 of PPS3 sets and example of 10 – 20%. In this light PPS3’s emphasis is clearly on increasing delivery and also ensuring that there is sufficient flexibility to deal with non-implementation, with potential for Local Planning Authorities to set a level of house building 20% in excess of the RSS housing requirement if appropriate.</p> <p>We are aware that at the recent Draft RSS EiP that there was some discussion as to the length of the District’s LDF plan-period (i.e. should be extended to 2026) and also the District housing requirement. Clearly these matters will not be resolved until the finalised RSS is published. In this light there is an obvious need to ensure that sufficient flexibility is incorporated into the Core Strategy in order that it can ‘pass’ the tests of soundness.</p>	<p>Commercial Estates Group</p>
<p>We note the advice of PPS3 at paragraph 63 which advises local planning authorities to set out an acceptable range of housing delivery, relative to the requirement. Paragraph 64 of PPS3 sets an example of 10-20 per cent. In this light PPS3’s emphasis is clearly on increasing delivery and also ensuring that there is sufficient flexibility to deal with non-implementation, with potential for local planning authorities to set a level of house building 20 per cent in excess of the RSS housing requirement if appropriate.</p> <p>It is identified at paragraph 3.2 of the topic paper that projections from the CLG forecast that by 2026 an additional 54,000 houses will be required in the district. If this is to be achieved, then this equates to an average build rate of 2,700 units per annum (54,000/20 years). We note that this build rate of 2,700 is significantly in excess of those Draft RSS net annual new dwelling targets set out in the table at paragraph 3.3. of our topic paper. In this light we suggest that sufficient flexibility is built into the core strategy to account for this potential need to increase build rates over the LDF period.</p> <p>Furthermore, we are aware that at the recent Draft RSS EiP that there was some discussion as to the length of the District’s LDF plan period (i.e. should be extended to 2026) and also the District housing requirement. Clearly these matters will not be resolved until the finalised RSS is published. In this light there is an obvious need to ensure that sufficient flexibility is incorporated into the core strategy in order that it can ‘pass’ the tests of soundness</p>	<p>Hallam Land Management</p>
<p>There needs to be flexibility – there is a case for careful assessment of need at more frequent intervals than</p>	<p>Ilkley Civic Society</p>

<p>10 yearly national censuses. This needs to take account of the type of housing needed – bedsits, or 5 bed mansions. A different mix will be required in different settlements.</p>	
<p>It is essential that the council maintains a flexible and responsive supply of housing land. Paragraph 60 of PPS3 makes clear the requirement for authorities to ensure that they have a continuous five year supply of deliverable sites and advises that this should be monitored on a regular basis, linked to the annual monitoring report. This process should include:</p> <ol style="list-style-type: none"> 1. Setting out the approach by which allocated sites will be advanced into the five year supply 2. Monitoring how many sites from the five year supply have been delivered 3. Drawing upon allocated sites as necessary to ensure that there is a continuous five year supply 4. Considering whether housing and land evidence bases and relevant LDDs require updating in order to maintain the five year supply 	<p>Miller Strategic Land</p>
<p>The plan must be flexible and responsive to market pressures. PPS3 requires that LPAs identify sufficient sites to accommodate a rolling 5 year supply of housing based on RSS figures and where possible sufficient sites for a further 10 years. The LDF therefore needs to plan for a 15 year timescale, which would take the plan period beyond 2021.</p> <p>The traditional ‘windfall’ allowance should not form part of the housing land supply figure, in the interests of providing certainty of delivery, unless it is not possible to allocate sufficient land.</p> <p>Housing supply can be phased in order that the LPA can control when and how sites are released. It is suggested that, for consistency, these phases should accord with the time periods set out in RSS as follows:</p> <ul style="list-style-type: none"> • <i>Phase 1 – now until 2011;</i> • <i>Phase 2 – 2011 to 2016</i> • <i>Phase 3 – 2016 to 2021</i> • <i>Phase 4 – beyond 2021</i> 	<p>Redrow Homes Ltd</p>
<p>The Council should effectively manage the housing supply through implementing PPS3 appropriately. There should always be a 15 year land supply of deliverable sites. Nevertheless, if unexpected circumstances arise there should be “reserve” or “safeguarded” sites that can be brought forward immediately if there are any shortfalls in housing supply.</p>	<p>Taylor Woodrow Developments Ltd</p>

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