

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)  
(Representor ID: 423)*****Matter 6A: SUB AREA POLICIES (CITY OF BRADFORD INCLUDING SHIPLEY & LOWER  
BAILDON)*****Preamble**

1. On behalf of our client Persimmon Homes (West Yorkshire), we write to provide comments in response to the Inspector's schedule of Matters, Issues and Questions in relation to the Bradford Local Plan Core Strategy. This follows our previous comments made on the Publication Draft of the Core Strategy in March 2014.
2. Our client is one of the UK's leading house builders, committed to the highest standards of design, construction and service. They have a large number of site interests across Bradford District and therefore are very keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

**Persimmon Homes Site Interests in Bradford**

3. This is a list of our areas where our client has site interests:

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley
- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

- Nab Wood (Shipley)
- Heaton (North West Bradford)
- Daisy Hill (North West Bradford)

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 6A, which covers the sub area policies relating to the City of Bradford (including Shipley and Lower Baildon), is contained in this statement. The responses are with reference the Inspector's headings and questions below:

***Policies BD1 and BD2 – CITY OF BRADFORD INCLUDING SHIPLEY AND LOWER BAILDON***

**Strategic Pattern of Development**

**a) Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?**

6. In examining the distribution of dwellings around Bradford, Shipley and Lower Baildon the Council first examined additional dwellings that would be required as a result of demographic trends. For this area of the district this results in strong growth in North East, South West and North West Bradford. However as part of their process the Council adjusted the distribution as a result of the following:
  - Land Supply;
  - Growth Study;
  - HRA and South Pennine Moors Birds and Habitats Surveys;
  - Flood Risk and The Sequential Approach to The Distribution of Housing Growth; and
  - Other Factors – Maximising Previously Developed Land/Minimising Green Belt/Delivering Affordable Housing.
7. This in turn has reduced housing numbers in areas such as the North West of Bradford and significantly increased housing numbers in Bradford City Centre and South East Bradford (see

Table HO4 of the Core Strategy). Our client has concerns regarding this approach and does not believe this has been appropriately justified within the Council's evidence base.

8. As outlined in our statements in relation to Matters 4B and 4C, whilst the SHLAA generally provides land to meet the Council's current housing target (notwithstanding our client's view that the current housing requirement expressed in the Core Strategy is not sufficient), there are key deficiencies in a number of areas. The Strategic Housing Land Availability Assessment ("SHLAA") (May 2013) (EB/049) only shows capacity for 5,318 dwellings for South East Bradford, yet Policy BD1 has a target of 6,000 dwellings. Similarly the SHLAA only shows capacity for 2,752 dwellings in Bradford City Centre, whilst Policy BD1 indicates 3,000 dwellings for the same area. It is unclear from the evidence base how these numbers are going to be accommodated and would indicate that additional dwellings could be located elsewhere in this area to places such as Shipley and North West Bradford.
9. This idea is further reinforced when the viability is considered. *The Local Plan Viability Assessment* and its update (EB/045 and 0/46) cast doubt on the deliverability of sites in this area of the district; most notably in the City Centre and in the South East (where housing numbers are proposed to be bolstered). This again would point to a need to redistribute dwellings in this area to places which are more viable such as Shipley and North West Bradford; for example our client's site in this area of the district are capable of being delivered and would have the ability to add the Council's housing supply in a sustainable manner.

**b) Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

10. Whilst our client appreciates the need to concentrate development in certain parts of this area to stimulate regeneration and investment, at the same time it is imperative that sites are deliverable; especially given the scale of housing the Council will have to deliver over the plan period and the fact that at present it is under delivering housing and cannot demonstrate a 5 year supply of housing land (according to the 2013 SHLAA). The NPPF is very clear in this regard with paragraph 47 stating that local planning authorities need to 'boost significantly' their supply of housing.
11. Currently our client has strong doubts as to whether the Council can deliver the amount of housing stated in Policy BD1 in some of the areas and the Council's own evidence base in the form of the *Local Plan Viability Assessment* and update cast significant doubt on the deliverability of many areas in this part of the district (see Figure 4.2 and Table 4.4 of the Viability Assessment and paragraphs 5.1.3 and 5.1.4 of the update).

12. This lack of evidence to show that certain areas such as the South East and City Centre are deliverable means there are significant doubts over the effectiveness of this policy as currently drafted and whilst our client believes the Council can still provide some focus on regenerating parts of the district and using previously developed land, this cannot be at the expense of delivering much needed new homes. There therefore needs to be flexibility built into this policy to allow housing to be redistributed within this area if viability is affecting the delivery of some sites.

### **Urban Regeneration and Renewal Priorities**

**a) Is there sufficient justification and evidence to support the specific proposals for development, including at Bradford City Centre and Shipley/Canal Road Corridor? Has the policy considered the regeneration, environmental, viability, use of brownfield land, impact on heritage assets and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

13. As outlined above, our client supports the notion of regenerating areas of Bradford and its district and believes this is a laudable aim, however this needs to be balanced with the real need to provide deliverable and viable homes over the plan period. The Council's current approach which appears to prioritise the development of brownfield land (see Policy HO6) will have the effect of acting as a brake on development across the district as it is brownfield land which is often the most expensive to bring forward for development and in the current market these sites are unlikely to be viable, especially in areas like Bradford City Centre and the Canal Corridor; even without taking into account infrastructure requirements that may be needed on such sites and heritage constraints which may hamper delivery further.
14. To assist in delivery of dwellings in this area, our client believes the Council should focus on sites that can be delivered such as those around Shipley itself including our client's site at Nab Wood (SHLAA reference: SH/027). This will necessitate a review of the Green Belt through the Core Strategy but we believe this is necessary so as to provide some housing in this area to then help kick-start regeneration in the area.
15. Failing this, and in the event that these areas cannot deliver the numbers that the Council requires through the Core Strategy, then they should have the flexibility to redistribute the housing requirement to elsewhere in the district.

**b) Is the proposed policy approach to peripheral communities, including the specific villages listed, justified, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

16. Our client has no comments relating to this question at this stage.

### **Growth Areas**

#### **a) *South East Bradford***

17. Our client has no more specific comments relating to this area of Bradford outside of our general observations made above. We however reserve the right to comment on this area further in relation to our client's site interests.

#### **b) *North East Bradford***

15. Our client does not have any specific comments relating to this area of Bradford. We however reserve the right to comment on this area further in relation to our client's site interests.

#### **c) *North West Bradford***

16. Our client supports growth in this area of Bradford and believes that housing delivery in this part of the city is much more deliverable than other areas such as South East Bradford and the City Centre (see the Council's *Local Plan Viability Assessment (EB/045)*). It is clear from the 2013 SHLAA that the area is capable of delivering a large proportion of the Council's housing requirement but in order to unlock its potential there will be a need to review Green Belt boundaries as part of the Core Strategy.

17. By doing this North West Bradford will be able to compensate for any lack of delivery in other areas of Bradford where house building is less viable. As outlined above, the Council therefore need to be pragmatic and flexible in how housing development is distributed in Bradford so that areas such as the North West can compensate for other areas struggling to deliver housing. In this respect our client's two sites in North West Bradford (SHLAA references: NW/031 and NW/049) are ideal candidates to contribute towards the Council's housing supply and so should be released from the Green Belt as part of the Core Strategy (rather than part of an Allocations DPD as outlined in Policy SC7).

***d) South West Bradford***

18. Our client does not have any specific comments relating to this area of Bradford. We however reserve the right to comment on this area further in relation to our client's site interests.

***e) Economic Development***

19. Our client does not have any specific comments relating to this topic. We however reserve the right to comment on this area further in relation to our client's site interests.

***f) Environment***

20. Whilst our client generally supports strategies to improve the environment around this area of Bradford and its district, specific measures for development sites need to take into account the cost and viability of such measures and bearing in mind the advice contained in paragraph 173 of the NPPF which makes it clear that development should not be subject to policy burdens that threaten its viability. In particular whilst any policies concerning renewable energy/CHP should encourage their incorporation into schemes, they should not mandate that they are included (as outlined in paragraph 17 of the NPPF).

***g) Transport***

21. Our client does not have any specific comments relating to this topic. We however reserve the right to comment on this area further in relation to our client's site interests.

***h) Outcomes***

22. Whilst the Outcomes contained in paragraphs 4.1.1 to 4.1.11 of the Core Strategy are useful to illustrate how the Council envisages the area to be in 2030, in isolation these are of little use. Instead the Council need to explicitly show how the Policy BD1 is going to work in reality especially in the sense of bringing sites forward, reviewing Green Belt boundaries and ensuring development in part of the district can become viable and ultimately deliverable.