

Local Plan for the Bradford District:

Core Strategy (Publication Draft)

Background Paper: 2. Housing (Part 1)

Housing Requirement, Supply and Distribution

February 2014

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1. INTRODUCTION

- 1.1. This background paper aims to provide further information and explanation of the policies within the Core Strategy Publication Draft relating to the scale of housing required, settlement housing targets and previously developed land. It includes an overview of how the policy approach has evolved from the early stages of plan preparation, the evidence which underpins the policy and how that has changed, and how the policy approach accords with Government guidance within the National Planning Policy Framework (NPPF).
- 1.2. Each section begins by setting out the background to the policy or issue and explains what the policy is seeking to achieve. It also touches on the early stages of policy development at Issues and Options and Further Issues and Options and the broad response to the consultation and engagement at that time. These matters are dealt with briefly in this paper since the extended period over which the Core Strategy has been prepared means that much of the background – in particular the extent national planning guidance has changed over that period. Moreover the different stages began with the RSS a legal part of the statutory development plan which is no longer the case. However if the reader wishes to do so there is extensive and further detail on these earlier stages on the council's website at www.bradford.gov.uk/corestrategy

2. OVERVIEW OF KEY EVIDENCE BASE DOCUMENTS

- 2.1. A summary below – these will be discussed in more detail in the subsequent sections.
- 2.2. The Housing Requirement Study February 2013 – a study commissioned by from consultants GVA & Edge Analytics to objectively assess the level of housing required in the district. It used a range of data including government population and household projections and regional economic projections.
- 2.3. The Housing Requirement Study Addendum Report August 2013 – updates the above report to take account of the issuing of the Government's interim 2011 based household projections.
- 2.4. The Strategic Housing Land Availability Assessment October 2011 – the first SHLAA produced by the Council, it provides an analysis of the deliverable and developable land supply in the district. Data is presented in a number of ways – by geographical area, by site type and by delivery timing.
- 2.5. The Strategic Housing Land Availability Assessment Update May 2013 – an update to the first SHLAA which added nearly 300 new sites partly as a result of call for sites submissions and partly as a result of the inclusion of smaller sites within the study.

- 2.6. The Growth Study – carried out by consultants Broadway Malayan, it assessed the potential for each of the settlements in the district to accommodate growth in the way of green belt releases. It systematically looked at planning and environmental constraints around the settlements, assessed green belt role and function and assessed each settlement against a range of economic, social and environmental criteria.

3. POLICY HO1 - THE OBJECTIVELY ASSESSED NEED FOR HOUSING

Background & Early Stages of Policy Development

- 3.1. One of the key roles of the Core Strategy is to assess and then set out the number of new homes which will need to be planned for to meet the needs of the District's current and future population and by doing so also support the local economy
- 3.2. As with all of the different elements of the Core Strategy, the assessment of the scale of new housing needed over the plan period, has evolved over the 3 previous stages of production. However over this time the context in terms of national planning policy and the nature of the statutory development planning system has seen considerable changes. Both the Issues and Options and Further Issues and Options stage consultations took place at a time when Regional Spatial Strategies (RSS) formed part of the statutory development plan. Under this regime it was the role of the RSS and not the Core Strategy to assess the need for housing and set district wide housing requirements. For this reason Topic Paper 3 of the Issues and Options consultation in February 2007 merely reported the targets within the draft Regional Spatial Strategy for Yorkshire and the Humber (January 2006) which were 1560 per annum over the period 2004-11, 1920 per annum for the period 2011 to 2016 and 2180 per annum for the period 2016-21 giving a total projected requirement of around 31,000 new homes.
- 3.3. The emerging RSS work was based, much as is the case now, around the most up to date at the time population and household projections issued by the government. The Yorkshire and Humber Assembly, who prepared the RSS, also carried out some modelling of household growth and undertook reality checking of the emerging housing targets based on delivery and environmental criteria before arriving at distribution of the region wide housing target among the constituent local authority areas.
- 3.4. Even though no specific questions about the housing requirement were included in the housing topic paper at Issues and Options stage, a number of representations on the matter were made some questioning the need for the level of housing suggested by the RSS while others pointed to the 2004 based household projections which had just been issued and which it was claimed suggested the draft RSS housing targets for Bradford had under estimated housing need.
- 3.5. By the time that the Further Issues and Options Stage consultation took place in early 2008, a revised RSS housing requirement for Bradford of 2700 per annum for the period 2008-26 had been put forward by the Secretary of State. This was based on the much higher rates of population and household growth within the Government's 2004 based projections. Once again the Core Strategy consultation

documents took on board the RSS targets and this resulted in the total estimated housing need to rising to 50,000. The Further Issues and Options stage consultation focused on how this growth could be accommodated putting forward 4 different spatial options with different levels of growth assigned to the regional city of Bradford, the Principal Towns of Ilkley, Keighley and Bingley and the smaller settlements. Consultation responses therefore focused on both the vision and spatial options though once again some respondents did raise concerns over the reliability of the housing need projections.

3.6. The Core Strategy Further Engagement Draft (CSFED) was published for consultation between October 2011 and January 2012. Although the Yorkshire and Humber RSS was still at this point part of the statutory development plan the Government had by now announced its intention to revoke all regional strategies and remove the regional planning element of the statutory development planning system. The main elements of the approach to setting the housing requirement CSFED were as follows:

- To broadly follow the annual housing targets set out in the Yorkshire and Humber RSS;
- To set a housing requirement to 2028 – in line with both the guidance in PPS3 and the merging NPPF which advocated planning for housing over a period of 15 years from the expected date of plan adoption;
- To utilise the RSS plan period which started from 2004 and to therefore calculate and include any backlog in under delivery over the period to March 2011;
- To apply a 10% reduction in the annual housing requirement advocated by the RSS for the period 2008-16 when market conditions were expected to be weak;
- To include a windfall allowance of 600 dwellings per annum for the final 5 years of the plan period.

3.7. The result of this was a total calculated housing requirement for the period 2004-28 of 60,240. After subtracting net completions over the period 2004-11 of 9,599, a 10% reduction in the RSS target for the years 2008-16 of 2,160 and a windfall contribution of 3,000 the remaining residual requirement for 2011-28 was just under 48, 500. These figures are set out in table 1 below:

Table 1: CSFED Housing Requirement Calculation

RSS Housing Requirement 2004-8	(1560 x 4)	=	6,240
RSS Housing Requirement 2008-28	(2700 x 18)	=	54,000
Total RSS Housing Requirement 2004-28		=	60,240
Minus Net Completions April 2004 to March 2011		=	9,599
Minus 10% discount on Requirement 2008-16	(2700/10) x 8	=	2,160
Minus 600dph windfall allowance for 2023-28	(600 x 5)	=	3,000
Total Reductions			14,759
REMAINING HOUSING REQUIREMENT 2011-28			45,481

3.8. A significant number of representations were made to the CSFED taking in many occasions, polar opposite views. In broad terms development sector respondees

raised objections taking the view that the requirement had been set too low and in particular disagreeing with the idea of including the 10% discount and the windfall element. Again in broad terms residents and community groups, concerned with the potential impacts of large scale housing growth on the environment and infrastructure, raised objections suggesting that the requirement was too high. Concerns were again raised about the validity of the Government's population and household projections while another common theme was the view that there was insufficient demand given the state of the housing market and economy for such a large number of new homes.

- 3.9. It is important to understand that at the time the CSFED was prepared the planning guidance relating to setting housing requirement was in transition, the NPPF was yet to be finalised, and best practice in how Local Planning Authorities as opposed to Regional Assembly's was only just emerging. It was however clear from the responses received and the emerging guidance that although nationally issued population and household projections would continue to be core to any estimate of housing need, the Council would need to commission independent guidance on the setting of the requirement and this is indeed what subsequently happened.
- 3.10. Sustainability appraisal forms an integral part of the process of developing and testing a Core Strategy. The SA process aims to assess the overall environmental, economic, and social impact of the plans objectives, strategic choices and policies. The Interim Sustainability Appraisal of the Core Strategy Further Engagement Draft (October 2011) considered that the effects of the policy would be neutral when measured against the majority of the 19 SA Objectives. The policy did however contribute strongly to SA Objective 8 - to "Provide the opportunity for everyone to live in quality housing which reflects individuals needs, preferences and resources."

National Planning Policy Framework

- 3.11. In moving on from the CSFED the Council has attempted to develop an approach which reflects revised and updated evidence and which fully conforms to the Government's National Planning Policy Framework (NPPF).
- 3.12. The NPPF, issued in March 2012, contains a number of statements relevant to the setting of the plan's housing requirement. At its heart is the view that Local Plans should plan positively to support growth. The specific points within the NPPF relevant to setting the housing requirement are as follows (key phrases in the view of the Council are highlighted in bold):
- 3.13. Paragraph 14 states that local planning authorities should **positively** seek opportunities to meet the development needs of their area and that local plans should meet **objectively assessed needs**, with sufficient flexibility to adapt to rapid change unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits;
- 3.14. Within paragraph 17, which sets out core planning principles, the NPPF states that "Every effort should be made **objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.** Plans should take account of market signals, such as land

prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”

- 3.15. Paragraph 47 states that local authorities should take a number of actions to **boost significantly the supply of housing** including the use of their evidence base to ensure that their Local Plan **meets the full, objectively assessed needs for market and affordable housing** in the housing market area.
- 3.16. Paragraph 48 states that Local Planning Authorities **may make an allowance for windfall sites in the five-year supply if they have compelling evidence** that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 3.17. Paragraph 51 states that Local Planning Authorities should **identify and bring back into residential use empty housing** and buildings in line with local housing and empty homes strategies.
- 3.18. Paragraph 157 states that Local Plans should **plan positively** for the development and infrastructure required in the area, and be drawn up over an appropriate time scale, **preferably a 15-year time horizon**.
- 3.19. Paragraph 159 states that Local Planning Authorities should have a clear understanding of housing needs in their area and **identify the scale of housing needed to meet household and population projections, taking account of migration and demographic change**. In this respect it was subsequently clarified by the Government in Parliament that the projections being referred to were the Government’s nationally issued projections.¹

Evidence

Housing Requirement Study (February 2013)

- 3.20. The NPPF it is clear that the housing requirement within the Core Strategy must be based on an objective assessment of need which uses the most up to date available evidence and that the core of that evidence must be the official Office for National Statistics (ONS) and Department of Communities and Local Government (CLG) projections and population growth. Equally it is important to understand the components and drivers behind those projections, acknowledge any uncertainties, and factor in any locally relevant market and economic data. With this context in mind the Council commissioned consultants GVA and Edge Analytics to produce a

¹ In response to a question asked by Lord Hodgson of Astley Abbots on the 25th October 2011 in the House of Lords around the source of total population to be used in assessing housing requirements as set out in the draft National Planning Policy Framework Baroness Hanham replied: “When assessing their housing requirements in future years as part of a strategic housing market assessment, authorities should use the most recently released sub-national population projections (published by the Office for National Statistics) and household projections (published by the Department for Communities and Local Government).”

Housing Requirement Study. The purpose of the study was to provide a sound evidence base which enabled the Council to :

- Obtain independent advice and scrutiny of the future level of new housing needed including an audit and assessment of available data, most notably from the Government's latest population and household projections;
- Develop a robust, transparent and effective means of determining an appropriate and justifiable local housing requirement for the Bradford District; and
- Explore the potential scale of future housing required in the Bradford District to support future population growth and economy of the District.

3.21. Within this research a range of alternative input assumptions were applied to the nationally produced ONS sub-national population projections (SNPP), 2010 base, in order to produce a number of scenarios of potential projected changes to the growth in the number of people and households over the plan period. This analysis utilised the POPGROUP suite of software which is recognised as the industry standard demographic model.

3.22. In developing these scenarios consideration was given to alignment with other important informing parts of the Council's evidence base such as the Yorkshire and Humber Regional Econometric Model (REM) and the SHLAA as well as wider Corporate Strategy and Policy documents.

3.23. The research process involved local stakeholders. Early in the research process a Stakeholder Workshop event was convened to present stakeholder representatives from the public and private sectors with an opportunity to comment on the proposed methodology to the research and respond to a presentation of the initial outputs of the research examining the strategic drivers of the housing market. This event was well attended and included a good representation in terms of the scope of partners represented. Stakeholders were also invited to a presentation of the results of the work once the initial report was complete.

3.24. At the time of production of the initial report the key inputs into the work and most up to date data were:

- The 2010 based sub national population projections issued by the ONS;
- The 2008 based sub national household projections;
- The latest run of the Yorkshire and Humber Regional Econometric Model;

3.25. The modelling and analysis of future population and household change revealed the following key points:

- Bradford's population will continue to grow in the future. This growth will be driven to a relatively significant extent by the ongoing balance between natural change factors, births and deaths.
- Bradford's comparatively youthful population means that without a significant increase in the out-migration of residents the population will grow of its own accord;
- Migration will also continue to play an important role in shaping the growth of Bradford's population. The ONS project a continued net increase in population resulting from international migration with this assumption built into the re-based 2010 Sub National Population Projections (SNPP). This is based on a continuation

of recent trends. The continued net growth of the population from this component also further reinforces the impact of natural change with this migrant population assumed to include a high proportion of younger persons.

- However the projections also assume a continuation of the trend of net out migration of residents moving in and out of Bradford from other parts of the UK.
- Collectively these factors continue to show a strong projected growth in the population with the higher levels of natural change linked to international migration as well as the direct effect of this net international migration offsetting the sustained net outflow of migrants to other parts of the UK;

3.26. However the report made a further and quite crucial point for judging how to set a target which meets not just demographic trends but also supports and facilitates economic growth within the District. The report states,

“The projection forward of historical trends does not however, take account of the relative health of Bradford’s future economy. Flows of international migrants into the authority in particular have, at least in part been attracted by the offer of employment. Recent economic forecasts consistently predict a steady growth of Bradford’s economic base, reflected in a growth in employment opportunities, a shift from the impact of recent job losses resulting from the wider UK recession. The modelling of a projection of the population of Bradford constrained to a scenario of future job growth (27,000 additional jobs), illustrates that rather than the district seeing an increasing out-migration of people, the offer of jobs will serve to retain parts of the population which may otherwise choose to move out.”(Paragraph 7.9, page 81)

3.27. The paragraph is crucial because the Council considers that a consistent and cogent strategic approach to setting the district wide housing target within the Core Strategy must reflect and align with the Council’s assumptions and aspirations of economic growth. Moreover the provision of new housing has the potential to itself contribute to economic growth in the District.

3.28. Having illustrated the effects of taking different assumptions on a number of variables the report concludes by recommending the use of two different scenarios for estimating future housing need.

- Rebased Sub National Population Projection (SNPP) 2010 (the rebasing of the starting population taking account of the latest 2011 Census results) and
- an employment-led scenario which constrains future population growth to match forecast levels of employment generation within the Yorkshire and Humber REM.

3.29. The consultants report concludes by stating that without assumptions around the re-use of vacant stock, the translation of household growth projected under these scenarios into dwelling requirements suggests a dwelling requirement of between 2,210 (Re-based SNPP 2010 scenario) and 2,565 dwellings (Employment-led scenario) per year as appropriate for Bradford.

3.30. While it is clear that meeting the scale of housing growth advocated in the report will be challenging it is also important to recognise the benefits of doing so. The Housing Requirement Study suggests that delivering homes at this rate will lead to a number of positive outcomes including:

- The strong growth of the labour-force representing a significant asset in ensuring the foundation for a more resilient economy in the District in the future;
- The potential to generate significant amounts of direct and indirect employment through the development and construction of new housing;
- The capacity to increase local spending power linked to the growth in population helping to support retail and other service sector businesses; and
- Increasing Council Tax revenues and payment of New Homes Bonus which can help to support investment in services, infrastructure and environmental improvements.

3.31. The study also warns that a failure to at least deliver housing to meet the level of household growth projected under a Rebased 2010 SNPP scenario would lead to potential increased levels of out migration to other surrounding authorities, undermining the size of the labour-force and therefore the potential to realise the growth of the existing business base and to attract new investment to the District.

Housing Requirement Study Addendum Report (August 2013)

3.32. At the time the Council commissioned the Housing Requirement Study it was expected that new and updated Sub National Household Projections would be issued by the Government in the near future. The commission therefore also required the consultants to advise on the implications of the new projections and if necessary re-run the core scenarios and adjust the recommendations.

3.33. In April 2013 the CLG did indeed issue new 2011 based projections. Although these projections were issued as interim projections, covered only a period of 10 years and were based on the previously issued interim 2011 population projections, the Government nonetheless made it clear that Local Planning Authorities must utilise and take account of these as the latest official projections in their Local Plan work and that these new household projections superseded the previous the 2008 based projections.

3.34. As a result the Addendum report covers the following:

- A discussion of the robustness and weaknesses of the 2011 interim household projections;
- A re run of the 2 core modelled scenarios from the first report but utilising the new household projections;
- An updated recommendation on the level at which the Council should set its annual housing requirement.

3.35. Table 2 below outlines the outcomes of the 2 re-run scenarios and compares the resulting housing requirements to those produced in the initial report.

Table 2 – Comparison of the 2 Core Scenarios In The Initial and Addendum Reports

	SNPP Scenario Initial Report (2008 Based Household Projections)	SNPP Scenario Addendum Report (Interim 2011 Based Household Projections)	Employment Led Initial Report (2008 Based Household Projections)	Employment Led Addendum Report (Interim 2011 Based Household Projections)
Households 2011	199,300	199,172	199,048	198,774
Households 2028	235,778	227,155	241,381	228,605
Households Change 2011-28	36,478	27,983	42,333	29,831
Dwellings Required (3% Vacancy Assumed)²	37,572	28,822	43,603	32,064
Net Annual Dwelling Requirement	2,210	1,695	2,565	1,807

3.36. It is important to recognise that the issuing of the 2011 projections on an interim basis has put all councils preparing their Local Plans at this time in a difficult position. Firstly the projections are only covering a 10 year period to 2021 meaning that Council have to take a judgement on how headship rates and therefore household growth will change in the period post 2021. The consultants Addendum report suggests that the two options, neither ideal, are to either assume a continuation in the headship rates trend in the period post 2021 or alternatively “freezing” headship rates at projected 2021 levels. The consultants conclude “In the absence of information regarding headship rates post 2021 to 2028; it is considered that the most appropriate basis for projecting is the trend-based assumption. (Addendum Report, page 7, paragraph 4.3)

3.37. The second dilemma facing Councils such as Bradford is that as all household projections issued by CLG are trend based and therefore reflect an assumed continuation of the trends over the 5 years preceding the projection base date. The 2011 interim projections therefore reflect the period of the depths of the credit crunch and recession. Adopting the 2011 based projections would therefore assume recession type conditions over the whole of the Core Strategy plan period to 2030

² In the February 2013 Housing Requirements Study the overall household growth figures were translated into dwellings required via the application of an assumed 3% vacancy rate and the figures were annualised. This reflects the fact that a properly functioning housing market needs a buffer of additional stock to enable turnover and choice and it also enabled comparison with the preceding Regional Spatial Strategy (RSS) targets which also allowed for a 3% vacancy rate.

which is neither realistic nor desirable. Equally even if Government guidance allowed for returning to the use of the 2008 based projections, which it does not, these projections, also trend based reflect a period of housing market boom and strong economic growth. The Addendum report therefore advises, “We would not recommend setting Bradford’s housing requirement by reference to the 2011 based interim household projections alone as this could imply a continuation of the economic conditions of the trend period i.e. of recession over whole of the Local Plan period. It would not therefore be supportive of the Council’s aspirations to achieve economic growth and regeneration, provide sufficient affordable homes and reduce problems of overcrowding in parts of the urban area.”(Addendum Report, paragraph 4.5) In the light of this advice it is suggested that setting the Core Strategy housing target by reference to the interim 2011 household projections alone would not conform to the Government guidance within the NPPF which requires Local Plans to support economic growth.

3.38. The consultants conclusion as to the best way forward – an approach which would both support growth, provide an appropriate level of new housing, but also reflect the current uncertainties – is set out in paragraph 4.6 of the Addendum Report. Here they state that given the uncertainty over where the real future performance of the economy and housing market might fall in the spectrum between assumptions underlying the 2008 and 2011 based household projections, the Local Planning Authority may consider that the most prudent approach would be to adopt a housing target which reflects this mid-point between the two employment based scenarios – a figure of 2,186 dwellings per annum.

3.39. In choosing to agree with the consultants recommendation to anchor the housing requirement to a mid point between the two runs of the employment led scenario (rather than utilising the runs based on the SNPP scenario which would produce a lower requirement) regards has been had to the following:

- The consistent advice in both reports that the demographic based runs pay insufficient regard to the influence of the economy and potential economic growth and therefore use of demographic based assumptions alone could hinder economic recovery in the District;
- The need to make sure that there is a degree of consistency between the assumptions in different parts of the Core Strategy. Taking one view assuming economic growth and regeneration in parts of the Core Strategy but then taking a more pessimistic view for the derivation of the housing requirement in another part of the Core Strategy would clearly not be a robust and justifiable approach; and;
- Concern that the utilising the 2011 based trends would assume the same level of economic and housing market performance for the whole of the plan period to 2030 which would not be right or realistic. Moreover it would imply that housing supply would be insufficient to meet future need and that existing problems such as overcrowding within the main urban areas and long waiting lists for social housing would continue.

The Publication Draft

3.40. The revised policy as presented within the Publication Draft therefore reflects the Housing Requirement Study, the consultation responses received to the CSFED and the content of the NPPF. The policy and relevant text is extracted and set out below:

Policy HO1: The District's Housing Requirement

A. Provision will be made within the Local Plan to facilitate the scale of new housing development as set out in Table HO1.

B. After allowing for net completions over the period 2004-13 and an allowance for the projected reduction in the number of vacant homes, the Local Plan will allocate land to meet the remaining requirement for at least 42,100 homes over the period 2013 to 2030;

C. Forthcoming DPD's will assess the projected losses to the existing housing stock from clearance and change of use and increase the level of allocations to compensate accordingly.

Table 3: Bradford District Housing Requirement

BRADFORD DISTRICT HOUSING REQUIREMENT 2004 to 2030				
A	Statutory Development Plan Housing Requirement 2004-8	(1560 x 4)	=	6,240
B	Statutory Development Plan Housing Requirement 2008 - 11	(2700 x 3)	=	8,100
C	Housing Requirement Study Based Housing Requirement 2011-13	2200 x 2	=	4,400
D	Total Housing Requirement 2004 - 13	A + B + C	=	18,740
E	Net Completions 2004 - 13	(From AMR)	=	11,053
F	Residual unmet Need 2004-13	D - E	=	7,687
G	Housing Requirement Study Based Housing Requirement 2013-30	2200 x 17	=	37,400
H	Total Housing Requirement 2004-30	D + G	=	56,140
PROVISION TO BE MADE IN THE LOCAL PLAN FOR THE PERIOD 2013 to 30				
I	Net Completions 2004-13		=	11,053

J	Allowance for Reduction in Vacant Homes		=	3000
K	Remaining Requirement To Be Met By Housing Site Allocations	H - I - J	=	42,087

Policy HO1 Summary

3.41. The key changes in Policy HO1 in comparison to the CSFED are set out below and in the Council's view reflect the consultation responses received but more importantly the updated evidence base and the NPPF as finally adopted:

- Annual housing requirements have been set based on the advice of GVA / Edge Analytics. The annual target has been applied from 2011 as this is the base date and starting point for the Edge Analytics modelling;
- The RSS housing targets have been retained to calculate the backlog of unmet need over the period 2004-11. The incorporation of an allowance for backlog accords with the requirements of government guidance. The backlog element is also justified by the fact that net completions over the period 2004 have fallen way below the level of household growth over the same period. The incorporation of a backlog element is further justified by the existing shortage in housing in the District as indicated by patterns of overcrowding in parts of the urban area and growing housing waiting lists.
- Net completions data has been updated and based on the AMR. It should be noted that representations at CSFED stage raised an issue that the official DCLG published statistics indicated a lower number of completions than that indicated in the AMR. The housing completions are accurately recorded in the AMR and the CSFED and Publication Draft. It is the DCLG figures which are incorrect and undercount completions as the DCLG were for a period only supplied with data relating to Building Control returns and did not also receive NHBC data thus missing out all completions signed off via this route.
- The inclusion of an allowance for windfall as set out in the CSFED has been removed. Guidance in the NPPF now only specifically allows for a windfall allowance within the 5 year land supply and even then only when compelling evidence of delivery from these sources can be shown. Bradford's SHLAA update has reduced the site size threshold and thus now includes sites of 0.2ha and above and / or 6 units and above. Although smaller sites continue to come forward the actual implementation of permissions in recent years has been patchy in part a result of the prevailing economic and housing market conditions. The Council therefore takes the view that while windfall may continue on small sites, in the short term the contribution from these sites are likely to modest. The Council also takes the view that as urban sites are recycled, windfall from larger sites may also come forward in the medium and longer term after the adoption of the Local Plan Allocations DPD. However it is suggested that it would be inappropriate to specifically allow for and numericalise this as a specific contribution to the housing requirement given the need for the Local plan to offer certainty in the land supply. Any windfall which does come forward will therefore be a bonus which will provide

a buffer in case housing need is greater than envisaged or some of the allocated sites are delayed in their delivery.

- The removal of any reduction in the housing market for weak economic and housing market conditions in the early part of the plan period. This reflects the Government's draft Planning Guidance which supports the NPPF. Moreover, EIP outcomes such as at Kirklees where Inspectors have rejected the idea of basing housing targets on 'effective demand'. In his letter to Kirklees Council dated 26 April 2013 the Inspector deals unequivocally with this point:

"The Council makes clear that the Core Strategy does not pretend to meet the whole of the identified need for housing in the local authority area. My understanding is that it seeks to provide only enough land to build sufficient market housing to accommodate those who can afford to buy them together with the number of affordable homes which could be reasonably provided alongside the market houses – the total being termed 'the effective demand'. The Council's approach takes no account of the requirements of paragraph 47 of the NPPF.

I can see no endorsement of the Council's approach in national guidance. The Council may consider that it is a pragmatic approach given the current availability of private finance. However, I would question whether this is a proper approach for Councils to take. In my view the government is expecting that Councils should be seeking to put in place the conditions which will enable developers to build the houses which are required to meet the full need. It is for the developer to decide whether the houses will be capable of being sold. If he concludes that the houses will not sell, he will not build.

- In line with Government guidance at paragraph 51 of the NPPF which states that local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies an allowance has been made for a reduction of 3000 vacant homes. This reflects the Council published Empty Homes Strategy and Action Plan.

3.42. The Council considers that in the following ways it has demonstrated that it has adopted a positive approach to setting the housing requirement which reflects the local and national imperative of support regeneration and growth:

- It has commissioned an independent housing requirement study which provides objective and robust evidence and then followed its recommendations;
- It has rejected the idea of adopting the lowest possible figures in the ranges as this would not reflect the level of housing need and would mean that the housing requirement would be more vulnerable to changing circumstances;
- It has rounded up and not down the recommended annual housing requirement figures;
- It has based its housing requirement figures on modelling which incorporates economic growth data even those these projections are higher than those which are based purely on the sub national population projections;
- It has included a backlog element to reflect under delivery of new homes in recent years;

- Above all and in line with government guidance the housing requirement will produce a significant boost to the supply of housing. The annual target of 2200 homes lies well above recent rates of delivery which have been in the order of 700 and above the level achieved at the height of the housing market (2156 net completions were achieved in 2007/8 – a spike in delivery with the next highest annual rate at the time being just 1578 the previous year).

3.43. The Council's approach also reflects constructive and effective co-operation with adjoining authorities. The Leeds City Region partnership of local authorities has commissioned Edge Analytics to develop a consistent and robust methodology for the objective assessment of housing need. This will ensure both consistency between adjoining authorities and that a sound approach to assessing need is adopted. The methodological approach recommended by Edge Analytics is consistent with that used within the Bradford Housing Requirement Study.

3.44. Finally it should be noted that Policy HO1 is broadly supported by the analysis within the SA of the Publication Draft document. The SA notes that the housing policies have a number of positive impacts, particularly with regard to the amount of new housing that will be delivered.

4. POLICY HO2 – STRATEGIC SOURCES OF SUPPLY

Background & Early Stages of Policy Development

- 4.1. Having assessed and set out the scale of housing required to meet need over the plan period it is also important that the Core Strategy indicates in very broad terms how this requirement will be met.
- 4.2. Policy HO2 therefore describes the main sources of supply, the balance between existing and known sites and new sites which will need to be identified within the Local Plan, the areas which will see particularly significant housing growth, area based initiatives which are planned or underway to deliver growth and an indication of the need for green belt change to meet the full housing requirement. It therefore sets out, as required by paragraph 156 of the NPPF, the strategic priorities for the area as far as they apply to meeting housing need.
- 4.3. Again, as with all of the different elements of the Core Strategy, that dealing with the strategic sources of supply to meet the District's housing needs has evolved over previous stages of production. The two earliest stages of consultation – Issues and Options in February 2007 and Further Issues and Options in January 2008 – were prepared before the Council's first SHLAA was produced and therefore focused on the broad principles of how development and growth should be accommodated rather than the practicalities of where deliverable and developable land supply is concentrated.
- 4.4. Nonetheless Topic Paper 2 at Issues and Options stage posed a number of fundamental questions of relevance including question '2.6 Should the City of Bradford be the focus of the majority of development?' and '2.7 What should be the role of lower order settlements?'. The topic paper set out a number of options in response to these questions including:
 - Option A - Regeneration and Selective Growth - Regeneration of the main urban area but with increased distribution of development to other selective larger settlements in the hierarchy;
 - Option B Dispersal Of Growth - Development to take place across all settlements (Dispersal)
 - Option C – Focused Growth Poles - Identify growth nodes (focused growth). This should focus significant new development in key locations with good infrastructure or in locations where infrastructure can be developed.
- 4.5. These themes were developed further in Issues and Options 'Topic Paper 3 – Housing' which posed the question, "How best should the additional housing requirement set out by the Region, be accommodated in the District?" The options suggested included:
 - By focusing the majority of the development in the city centre, Neighbourhood Development Areas and along the route of the proposed Bradford Canal;
 - By redeveloping underused land and buildings in the inner areas;

- By enlarging the main urban area with urban extension sites(including the use of safeguarded land)
 - By allowing peripheral towns and villages to enlarge (including the use of safeguarded land and/or green belt)
 - A combination of the any/all of the above (provide detail)
- 4.6. The consultation responses received were varied but with support for a concentration on the existing urban areas where possible to do so.
- 4.7. The Sustainability Appraisal analysis of these at this stage indicated, as might be expected that each of the options had a number of strengths and weaknesses. It is important to stress that at this stage the SA could only advise and assess in very general terms as the detail of each possible approach was insufficient to reveal development quantum and therefore the full implications in each case. In the SA report Option A had the advantage of focusing development where there was access to a wide range of services and facilities but the use of safeguarded land around the urban area was thought likely to impact on landscape and habitats. Selective growth of other larger settlements was argued to provide a wider choice of housing location and could support the improvement of services and facilities. Option B – dispersal of growth the SA argued would maximise the choice of housing location and might support existing or improved services in the villages but would also increase the need to travel. Option C – focused growth poles was considered by the SA to sustainably utilise existing infrastructure but extensions to the built up area raised the prospect of possible impacts on habitats and wildlife.
- 4.8. The significance of this SA analysis is therefore perhaps not the details of the analysis but the realisation that there is not one option alone which performs both strongly against all the environmental, social and economic criteria and at the same time has no potential weaknesses or problems.
- 4.9. Based on the above questions posed within the Issues and Options documents it can be seen that some of the elements of the Publications Draft's approach to meeting need such as the idea of growth areas or 'growth poles', focused development and regeneration of the main urban area and urban extensions were all tested and had their origins in the earliest stages of plan preparation. However as the realities of the scale of housing need and evidence on the deliverable and developable land supply have emerged it has become apparent that in order to meet housing need all of the above approaches would be needed and the remaining decisions were to be more concerned with the balance between these options and between different settlements and sub areas within the District.
- 4.10. The Further Issues and Options consultation therefore took the opportunity to map a number of different spatial options and assign development quantum to different locations within each option based on the settlement hierarchy thereby indicating where the balance between the regional city, principal towns and lower order settlements would be struck and also indicating whether and where growth areas might be required to accommodate development.
- 4.11. At this point it might be useful to make the point that at all consultation stages and in the Publication Draft growth areas have not been tied to or defined by an area accepting

a specific quantum of development. They have been defined in a softer way to represent areas which will be expected to see significant growth over and above what a neutral distribution of development, for example based purely on the size of the settlement, would imply. This allows growth areas of different scales to be identified with those relating to the urban areas and to urban extensions likely to involve much larger quantum than growth areas identified in smaller settlements.

4.12. The 4 spatial options at Further Issues and Options stage were termed:

- RSS Settlement Hierarchy - this option applies the 3 tier RSS settlement hierarchy of the regional city, 2 principal towns of Keighley and Ilkley and all other settlements being designated as Local Service Centres. Bingley is therefore not considered a Principal Town and no distinction is made between the smaller settlements.
- Continuation of the RUDP – this option had an element termed ‘significant growth targeted in Local Service Centres’. Among the centres identified were Queensbury, Thornton, Silsden, and Steeton with Eastburn, which have all been subsequently identified in the Publication Draft document as growth areas. Centres not taken forward as growth areas in the Publication Draft include Burley in Wharfedale, and Menston largely due to the need to conserve and protect the 2.5km buffer zone around the S Pennines SPA and SAC, and Denholme and Baildon due to land supply constraints and the view that there are more sustainable areas to take significant growth.
- Focused Growth Points Around Bradford Sub Regional City – in support of a significant focus on development within the Regional City, this option identified housing growth points at Holme Wood, the City Centre, Shipley and Canal Road Corridor and Esholt. Of these 4 only Esholt is no longer included as a growth area in the Publication Draft. At Esholt the proposed focus has switched to economic development taking advantage of proximity to Leeds Bradford airport.
- Dispersed Growth Points – this option maintains a relatively high level of concentration on the regional city and retains the 4 housing growth points in Bradford but disperses a little more development to the smaller settlements and in particular to a selected number of the larger villages. These are termed Local Growth Centres. In the Dispersed Growth Point option these include Queensbury, Thornton, Silsden, and Steeton with Eastburn which remain as growth areas in the latest Publication Draft but also include Burley in Wharfedale, Menston, and Bingley which are not.

4.13. Appendix 1 contains a table which lists the 4 spatial options and the broad SA response in each case. Again it is notable that all the different options had potential strengths and weaknesses. Although the options with greatest concentration on development within the main urban areas of Bradford together with the Principal Towns scored strongly in terms of regeneration, maximising accessibility to services and reducing the need to travel, the SA also pointed out potential problems including pressure on existing infrastructure and loss of green spaces within settlements.

National Planning Policy Framework

4.14. By setting out the strategic sources of supply in Policy HO2 the Council has sought to provide clarity over how the District’s housing needs will be met and to develop an

approach which reflects the guidance within the Government's National Planning Policy Framework (NPPF).

4.15. The NPPF, issued in March 2012, contains a number of statements relevant to Policy HO2 and these are set out below:

4.16. Paragraph 17 of the NPPF sets out a number of core principles which planning should follow. These include :

- To 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas'. This in the Council's view support a strategic approach which defines a settlement hierarchy which reflects the size, character and function of different places and which - as far as possible and deliverable - focuses development within the main urban areas;
- To 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable';

4.17. Paragraph 52 states that 'the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns'. As the work on the Core Strategy has progressed it has become increasingly apparent that the required level of housing growth can only be accommodated if a series of carefully planned and located extensions to the District's settlements are brought forward. In the main the Publication Draft proposed that these be achieved by small local changes to the green belt but a larger urban extension is proposed at Holme Wood which is proposed as part of a wider package of measures to regenerate the existing neighbourhood.

4.18. Paragraph 83 states that 'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'. This is effectively saying that changing the green belt should only be considered where other practicable and deliverable options to meeting development needs have been explored and found to be insufficient. Crucially however it is confirming that it is perfectly permissible to change the green belt to meet development needs within a Local Plan if exceptional circumstances such as meeting housing need are proven. As detailed in the Publication Draft, the lack of sufficient, available and developable land supply in non green belt locations to meet need and the pressing imperative to provide for a rapidly rising population provides such exceptional circumstances.

4.19. Paragraph 159 of the NPPF states that Local planning authorities should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period

Evidence

The Strategic Housing Land Availability Assessment (SHLAA)

- 4.20. As indicated in the NPPF, the production of a SHLAA is a crucial part of the evidence base as it both informs the development of strategy and policy with regards to housing growth and distribution and provides a degree of certainty that the chosen spatial approach to meeting need is realistic. So far the Council has produced two SHLAA reports with the first underpinning the production of the CSFED and the updated report underpinning the current Publication Draft. A second update to the SHLAA is underway and will be completed later this year.
- 4.21. The Council's first SHLAA was published in October 2011 and was carried out in partnership with developers through the SHLAA working group. Significant features of the agreed SHLAA methodology included taking a national policy on, local policy off approach to determining site suitability. At the start of the process it was already obvious that it would be impossible to meet the district wide housing requirement if all sites were excluded which were affected by local planning designations. Therefore only designations where national policy is unequivocal that development will not be allowed such as Sites of Special Scientific Interest's (SSSI's) and sites within flood zone 3b were ruled out as 'unsuitable'.
- 4.22. Sites which were otherwise developable but which were affected by local policy designations were categorised as 'Potentially Suitable – Policy Constraints'. Such designations ranged from those where development would normally be avoided such as on flood zone 3a, and on urban greenspace, to those where the policy designation was unlikely to prevent development but which might affect the scale of development and site layout such as Tree Preservation Order's and conservation areas. In many cases only parts of the areas of sites termed as having policy constraints were covered by these designations.
- 4.23. The first SHLAA adopted a site threshold of 0.4ha which was equivalent to that used for site allocations in the RUDP. Over 700 sites were included in the SHLAA database and were subject to the 3 tests of suitability, availability and achievability.
- 4.24. The approach to estimating site capacity as agreed by the SHLAA working group was twofold – where sites had an extant planning permission then the yield within the application was used unless there was any evidence or more up to date information to suggest otherwise. In all other instances a site was placed within one of 4 categories, each with a given density range, depending on the site's location and the type of housing which was considered likely to be appropriate. It is important to stress that the density ranges adopted represented a compromise agreement between the Council and the market developers on the group. The densities chosen were a little lower than those which the Council would ideally have wished to use and a little higher than those initially suggested by the developers. It is important to stress that the density ranges adopted do not represent in any way a policy position on the part of the Council. The density ranges were as follows:

Table 4 – Density Assumptions Within The SHLAA

High Density	100-250 Dwellings Per Hectare (DPH)	Apartment style development predominantly in the city and town centres, but also on specific types of sites where this form of development has been promoted in masterplans or, in early discussions with the Council as the form of development appropriate for the site. Includes student accommodation.
Medium / High Density	51-99 DPH	Areas subject to master planning proposals or in particularly accessible locations within the urban areas, where a mix of densities would be most likely to include both apartments and other family housing as part of the mixed character of the area.
Medium	41-50 DPH	Sites within the urban area with good access to local facilities and transport, most suitable for mixed schemes which may include smaller family homes, elderly accommodation and some low rise apartments.
Low	30-40 DPH	Sites most appropriate for family homes, within and on the edge of the urban area and rural locations.

4.25. As has been the case across the country, the rate at which sites are built out has changed since the onset of the credit crunch and recession. Annual development rates of 50 units which were common place previously are now very rare. Development rates directly feed into the SHLAA trajectory of expected delivery. Therefore on the advice of the members of the SHLAA working group a very cautious approach was taken to expected delivery rates particularly in the early part of the study period. For sites yielding less than 150 units an average build rate of 20 units per year, rising to 30 units per year for larger sites was applied in the early part of the trajectory, given the expected weak housing market. After year 7 the assumed delivery rate rose to either 30 units a year or 40 depending on site size as above.

4.26. One of the effects of this quite slow projected rate of delivery was that some of the sites within the trajectory – those which needed a change in development plan status to process such as green belt and which were therefore only programmed to commence delivery in the middle or end of the trajectory – are not fully developed out within the study period leaving a specified residual capacity for the longer term. For the purposes of setting the Core Strategy’s policy approach and housing targets it has been assumed that most of these sites can be brought forward at an earlier point either as a result of initiatives to unlock develop potential such as providing infrastructure or site assembly, or earlier via allocation in the Local Plan process. It has also been assumed that these sites could be potentially developed out faster if demand and the overall state of the housing market permits.

4.27. An overview of the results of the SHLAA, in particular the scale of land supply, revealed a number of key points:

- The total SHLAA capacity of deliverable and developable sites was 44,051 which was lower than the then proposed housing target of 45,500 with the CSFED;
- Over half of this capacity fell within the category of ‘potentially suitable – local policy constraints’
- Around 12,800 of the developable capacity was on green belt sites;

- The land supply trajectory was heavily skewed to the middle and latter part of the trajectory period;

4.28. Because the total deliverable capacity in the first SHLAA was just below the housing requirement within the CSFED it is fair to say that the individual SHLAA capacity totals for each settlement were central to determining settlement housing targets in Policy HO3 and also the need to identify the growth areas, and urban extension and local green belt changes as part of the strategic sources of supply in Policy HO2.

The Strategic Housing Land Availability Assessment Update May 2013

4.29. An update to the first SHLAA was published in May 2013. In an attempt to identify additional land supply the site size threshold for inclusion in the study was reduced from 0.4ha to 0.2ha or 6 dwellings. Additional sites were identified via further survey work and a significant number of new sites which were submitted by landowners, developers and the public. As with the first study, the SHLAA update extracted the latest data from the Housing Land register. The total site count within the SHLAA update rose to just under 1000. The methodology was broadly similar to that of the first study and SHLAA working group members again provided input and advice on all the site assessments. The relatively cautious assumption relating to annual build rates were retained.

4.30. The headline results from the SHLAA update were as follows:

- The total capacity of deliverable and developable sites including residual had risen to 53,708 which is now well in excess of the total proposed District wide housing requirement within the CSPD of 42,100;
- Just under 19,500 of this capacity was categorised as suitable now and therefore potentially able to contribute to delivery in the early part of the Local Plan period;
- Just under 33,000 of this capacity was categorised as ‘potentially suitable – local policy constraints’;
- 19,000 of the capacity is currently within the green belt.

The Bradford Growth Assessment

4.31. As work on the Core Strategy progressed and the land supply analysis of the SHLAA became available it became clear that any of the spatial options under considered would require a significant contribution from green belt release. In the District, the historically established green belt boundary was drawn very closely around the existing settlements leaving little scope for expansion and with only a limited supply of safeguarded land. In terms of landscape quality, topography, and accessibility to services and public transport, the land parcels immediately surrounding the different towns and villages varies greatly. Green belt function also varies greatly with some areas of land providing a separation between smaller settlements and other areas key to separation of the Leeds and Bradford urban areas and therefore performing a more sub regional role.

4.32. The SHLAA provides a partial indication of green belt potential – partial because the sites within it reflect merely those which had been submitted by landowners and

developers. Moreover it is not the role of the SHLAA to assess the relative merits of the different green belt sites and how they perform against key economic, social and environmental criteria.

4.33. The Council therefore commissioned consultants Broadway Malayan to carry out a growth assessment. The aim of the study was to provide the Council with a more systematic and comprehensive appraisal of the options for growth around each of its settlements and so inform both the strategic choices within the Core Strategy and also provide an initial platform for work on the Allocations DPD.

4.34. The Growth Assessment comprises two distinct elements:

- Element one uses a specific range of criteria to map constraints in the 500M zone around each settlement. Areas of relatively unconstrained land are therefore identified and mapped. This first stage also includes analysis of the current environmental, economic and social characteristics of each settlement to help determine their suitability for accommodating growth. This analysis also includes a broad appraisal of the role and function of the green belt around each settlement.
- Element two takes this research a stage further. It subjects the parcels of land identified within element one, together with some of the green belt sites within the SHLAA, to a series of environmental, social and economic sustainability testing criteria, thereby providing broad commentary on the potential (or not) of the land parcels to accommodate future growth.

4.35. The Growth Assessment provides a summary and conclusions for each settlement and each tier of the settlement hierarchy. It therefore gives a steer on the areas which provide the most sustainable opportunities to locate growth in the way of small or larger green belt releases, should they be needed. The report also indicates the number of and total area of land in strategic parcels which have some potential for growth around each settlement. It is important however to recognise the limitations of the analysis within the Growth Assessment. Each of the strategic parcels will need to be subject to more detailed survey and assessment including criteria which did not form part of the study brief. The Council are therefore currently examining these strategic parcels in more detail and will be adding any which continue after this further analysis to offer potential to the second SHLAA update.

4.36. As far as policy HO2 is concerned it is important to stress that the results of the Growth Assessment provide strong support for the proposed urban extension and focus on SE Bradford with this area scoring well in terms of economic criteria, regeneration potential.

The Publication Draft

4.37. The revised Policy HO2 as presented within the Publication Draft reflects Government guidance within the NPPF, the evidence base in particular the SHLAA update and the Growth Study, the Council's key regeneration programmes and initiatives within Bradford City Centre and the Canal Road Corridor; consultation responses received in particular to the CSFED and the analysis within the SA. The policy and relevant text is extracted and set out below

Policy HO2: Strategic Sources of Housing Supply

A. The dwelling targets set out in Policy HO1 will be met through:

- 1. Housing completions since April 2004 and**
- 2. Existing commitments with planning permission and**
- 3. Unimplemented but deliverable or developable sites allocated for residential development in the RUDP**
- 4. Safeguarded land sites identified in the RUDP**
- 5. Additional new deliverable and developable sites allocated for housing development within the forthcoming Local Plan Development Plan Documents :**
 - the Allocations DPD**
 - the Bradford City Centre AAP**
 - the Shipley & Canal Road AAP and**
 - Local Neighbourhood Plans.**

B. Specific area based initiatives to help deliver the supply targets will include:

- 1. Growth areas as follows:**
 - i) The development of an Urban Eco Settlement in the Shipley and Canal Road Corridor**
 - ii) Bradford City Centre**
 - iii) SE Bradford, and**
 - iv) Queensbury, Thornton , Silsden and Steeton With Eastburn.**
- 2. An urban extension at Holme Wood;**
- 3. Local green belt releases where consistent with the Plan's sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area.**

4.38. In the rest of this section the key components of the policy – the designated growth areas, the proposed urban extension at Holme Wood and the need for local green belt releases is discussed in more detail and the key changes since the CSFED outlined and explained.

Growth Areas - Shipley & Canal Road Corridor Urban Eco Settlement

4.39. The idea of creating a new area of housing within a high quality environment between the northern edge of Bradford City Centre extending to Shipley Town Centre has been part of the suggested spatial strategy right from the Further Issues and Options stage. It is underpinned by a substantial body of work. In 2010, the Council commissioned consultants BDP to prepare a Strategic Development Framework. The purpose of the commission was to test the development capacity of the Corridor and to produce a strategic masterplan in support of the Local Plan Area Action Plan (AAP) which is under preparation. The Canal Road Corridor is therefore now one of the Council's main regeneration priorities. A Joint Venture Company between the Council and Urbo Regeneration Ltd has been established to deliver the key development opportunities in the masterplan. Issues and Options stage consultation on the AAP took place between March and May 2013.

4.40. The approach of identifying the Shipley & Canal Road Corridor as a growth area for housing is broadly unchanged in the Publication Draft as compared to the CSFED. The only minor adjustment has been to slightly expand the area covered by this strategic sub area and as a result of this and the updated land supply analysis in the SHLAA, the housing target for the area as set out in Policy HO3 has risen slightly to 3200 units.

Growth Areas - Bradford City Centre

4.41. The regeneration of Bradford City Centre is a key council priority and therefore it has been included as an area for housing growth in both the CSFED and the Publication draft. The growth area status is underpinned by the extensive Masterplanning work commissioned by the Council and through the preparation of a second Action Plan which forms part of the Local Plan. The AAP was published for Issues and Options stage consultation between March and May 2013. Based on the land supply analysis within the SHLAA the target for the City Centre has been set at 3500 new dwellings.

Growth Areas – South East Bradford

4.42. South East Bradford also includes another of the Council's priority regeneration areas. The proposed Bradford SE growth area includes a combination of sites within the urban area utilising vacant and under used land, small scale green belt deletions and a proposed urban extension adjoining the Holme Wood estate.

4.43. The identification of the growth area is underpinned again by a considerable body of work. In March 2010, the Council commissioned consultants GVA to prepare a Neighbourhood Development Plan (NDP) for Holme Wood and Tong. Located on the south-eastern edge of Bradford City, the Holme Wood and Tong NDP area is characterised by predominantly social housing developed in the post war period. The area also sits adjacent to greenbelt and falls within the strategic local area identified as the Leeds Bradford Corridor (LBC), which includes the adjoining urban and rural areas between Leeds and Bradford. Holme Wood and Tong therefore hold strategic importance at the Leeds City Region level as well as the District level.

4.44. A key aim of the NDP was to establish the contribution that the neighbourhood could make in relation to accommodating a range of new homes, as well as developing a choice of facilities that ensure that the neighbourhood is attractive to residents in the future.

4.45. Given this context, the NDP sets a vision and delivery framework for regeneration, housing quality and growth across the estate and wider area. Its purpose is two fold - to facilitate the regeneration of the estate to create a sustainable local community; and to explore the potential for settlement growth and how this can raise the profile of the wider area within the context of the emerging Local Plan.

4.46. At a neighbourhood level it identifies incremental projects for delivering housing, economic regeneration and associated transport, social and green infrastructure and neighbourhood improvements of sufficient quality and scale to transform the quality,

condition, and visual appearance of the Holme Wood and Tong area. At the District level the NDP provides a framework for how the land surrounding Holme Wood can be used to respond to district-wide housing pressures, identified in the Local Plan Core Strategy for Bradford, and take advantage of its role and position within the Leeds City Region.

- 4.47. These two elements consider different geographical scales, but are interlinked in the ability of value generated through settlement growth to support the regeneration of the estate, and the improvement of the estate and its surroundings to attract new residents and investors into the area.
- 4.48. In preparing the NDP for Holme Wood and Tong, several stages of consultation informed the final document including developing a spatial vision and testing proposed approach through 2010 and 2011. The final NDP was approved by the Council in January 2012.
- 4.49. Since the adoption of the NDP further work has been undertaken by the Council to explore the detailed delivery of the NDP both in the short term and the long terms including work on the new access improvements through the West Yorkshire Transport fund plus.
- 4.50. The work to identify areas for potential housing development within the existing urban area of the NDP and also the proposed urban extension has been incorporated within the updated SHLAA. While the overall target for the Bradford SE area has been set at 6000 new homes the NDP, which forms only part of the Bradford SE area, suggested potential for 2,700 dwellings made up of 600 from infill sites within the existing estate and the remainder as part of the urban extension. The final configuration of sites and therefore the contribution from the NDP area will be finalised in planning terms via the Allocations DPD.

Local Growth Centres - Growth Areas – Queensbury, Thornton, Steeton with Eastburn and Silsden

- 4.51. In defining the settlement hierarchy both the CSFED and the Publication Draft have identified a number of smaller settlements as Local Growth Centres. These are settlements which have a wider range of services than many of the lower order local service centres and crucially are closely located and accessible to the much larger centres of either Bradford or Keighley. They have therefore been allocated a higher level of housing development and growth than would otherwise been the case and this growth has been shown to be deliverable within the land supply analysis of the SHLAA update. The need to identify local growth centres arose from the overall shortage in deliverable and developable land supply in the larger centres at CSFED stage when total land supply capacity in the District was actually lower than the total housing requirement.
- 4.52. A combination of a small reduction in the housing requirement proposed in the Publication Draft and a significant increase in land supply in the SHLAA update (albeit predominantly from green field and green belt sites) has meant that the Council has been able to propose a scaled back contribution from these smaller growth areas than that proposed in the CSFED. Two growth areas previously

identified in the CSFED (Burley in Wharfedale and Menston) have been omitted from the Publication Draft as a result of the HRA and the need to reduce development within the 2.5km buffer zone around the S Pennines SPA. As a result of the fact that Burley in Wharfedale and Menston are no longer identified as housing growth areas they have also been downgraded in the settlement hierarchy and are now identified in tier 4 as Local Service Centres.

4.53. The number of new homes and therefore scale of growth in the remaining 4 growth areas of Queensbury, Thornton, Silsden and Steeton reflects the smaller size of these settlements and is of a much lower order than the larger urban growth areas discussed above. Nonetheless, combined, the housing development proposed in these settlements is expected to make a significant contribution to meeting the district's housing needs.

The Need For Change To the Green Belt

4.54. Based on the evidence supplied by the SHLAA it is clear that the scale of housing required within the District will only be capable of being met if a significant contribution is made by changes to the green belt. Together, the objectively assessed need for new housing and the inability to meet all of that need in non green belt locations forms the exceptional circumstances required by paragraph 83 of the NPPF. The Growth Assessment has shown that there are a significant number of strategic land parcels which adjoin settlements which could be developed in a sustainable manner and which would not unduly harm the strategic functioning of the green belt.

4.55. Paragraphs 5.3.29 to 5.3.31 discuss the need for green belt in more detail and include an estimate that based on current data around 11,000 homes may be required to be located on land currently designated as green belt. It is important to stress that this numerical estimate does not form a policy within the plan. Other parts of the plan, including Policy HO7 (Site Allocations Principles) stress that the Council will seek to minimise as far as possible green belt release when it prepares the detailed site allocating components of the Local Plan. The estimate is therefore provided merely to ensure that there is complete clarity over the potential implications of the Core Strategies policies. The final number of homes required in the green belt could change if more sites are found within settlements, and if the yield from sites turns out to be higher or lower than those assumed within the SHLAA.

4.56. The SHLAA data and calculations from the updated SHLAA informed the estimated green belt quantum is set out in Appendix 3 to this paper.

Other Changes To Policy HO2 Since the CSFED

4.57. In line with the changes made to Policy HO1 and in order to ensure compliance with the guidance within the NPPF, windfall has been removed as a strategic source of supply within Policy HO2. However to aide clarity the policy now includes an acknowledgement of the need to utilise areas of safeguarded land allocated in the RUDP.

Policy HO2 Summary

4.58. In each case above the origins of the main strategic sources of supply have been described and justified. All have been underpinned by the evidence contained within the SHLAA. The Growth Assessment, in taking a wider look at the options for sustainable growth on the edge of the Districts settlements, has supported the South East Bradford area as being particularly suitable for growth. The drive to bring forward major growth areas within Bradford City Centre and Canal Road Corridor aligns with local and regional regeneration priorities and would help deliver the sort of sustainable growth focussed on the main urban area which the NPPF advocates. These urban growth areas in particular perform strongly when tested against the SA criteria. They are accessible to jobs and services. The concentration of development in these areas is serving to prevent a greater scale of dispersal of development and minimise the need for further green belt release. Development in all of these areas is deliverable. While some are capable of being progressed via the market without public sector intervention, others such as the Canal Road Corridor have established delivery mechanisms in place.

4.59. At the same time the level of housing growth required cannot be met via the growth areas within and adjoining the Regional City alone. Growth areas of a much smaller but still locally significant scale are put forward in the 4 Local Growth Centres of Queensbury, Thornton, Silsden and Steeton with Eastburn. Queensbury and Thornton lie in close proximity and with good access to the regional city while Silsden and Steeton with Eastburn are accessible to the neighbouring Principal Town of Keighley.

4.60. The different scales of development envisaged in these areas is indicated within the table below:

	Existing no. Dwellings (Council Tax Data April 2013)	Core Strategy Proposed Housing Target	% Increase
Bradford SE (Incl Holme Wood Urban Extension)	23750	6000	25%
Bradford City Centre	2518	3500	139%
Shipley & Canal Rd Corridor	558	3200	574%
Queensbury	3865	1000	26%
Thornton	2608	700	27%
Silsden	3515	1000	28%
Steeton	1802	700	39%

Note – existing dwellings figures relate to the number within the core strategy defined settlement and quadrant boundaries.

5. POLICY HO3 – HOUSING DISTRIBUTION (SETTLEMENT TARGETS)

Background

- 5.1. Within the Core Strategy Policy, HO3 sets individual targets for housing development for each settlement and therefore within each tier of the settlement hierarchy. Its goal is therefore to both illustrate how and where development can be located to meet the districts housing needs and provide a clear strategic basis for the production of the Allocations DPD, the two Area Action Plans and any Neighbourhood Plans.
- 5.2. The sections above have explained both how the overall housing requirement for the district has been determined and the main strategic contributors to meeting this need and has shown that this need will not be met unless a combination of growth areas at different scales are realised and unless green belt land is utilised. The first two stages of Core Strategy consultation only envisaged giving a broad indication of the geographical distribution of housing development by reference to both planned growth areas and the different tiers of the Core Strategies settlement hierarchy.
- 5.3. However, given the scale of overall development needed and the need to direct some of this development to the smaller settlements and to green belt it was decided that the Core Strategy should provide complete clarity over how the housing quantum would be distributed and the implications for each settlement. Resolving this issue at Core Strategy stage will provide the basis for detailed infrastructure planning to begin, and for the Council to be competitive in its attempts to secure funding.
- 5.4. It will also allow for the Allocations DPD to proceed much more quickly than would otherwise be the case – it would be difficult to resolve site selection decisions and conflicts in an Allocations DPD without such targets given the levels of development which will need to be accommodated and the complex range of issues affecting where growth should and should not occur. Providing settlement targets will also provide a clearer basis on which Local Neighbourhood Plans can be prepared should communities wish to do so.
- 5.5. Although the earlier stages of consultation – Issues and Options and Further Issues and Options – discussed the alternatives with regards to focused growth, growth poles, urban extensions and so on, and also began to apply quantum to the different tiers of the settlement hierarchy, neither early stage specified how the housing required would be assigned down to settlement level. This section of the housing background paper therefore focuses more on the evidence and rationale behind the settlement quantum at Publication draft stage and changes made since the CSFED.
- 5.6. The individual settlement targets have been influenced by a variety of factors and criteria ranging from very strategic ones such as the Plan's Strategic Core Policies, in particular the Settlement Hierarchy, to more specific local factors such as land supply and environmental constraints.

- 5.7. One of the strategic concepts - the Settlement Hierarchy approach - has been a key part at all stages of the plan's preparation and indeed the use of a settlement hierarchy is already embedded within the existing statutory development plan, the RUDP, and was also central to the now revoked Yorkshire and Humber RSS.
- 5.8. Appendix 1 includes a table which compares the 4 options which were subject to consultation at Further Issues and Options stage with the broad distribution within the Publication Draft. Following a comprehensive review of the extent of deliverable and developable land supply informed by the SHLAA, a blend of the 4 previous approaches was adopted. With population growth and therefore housing demand likely to be most acute within the main urban areas and particularly within the Regional City of Bradford it has been considered essential that the majority of development is focussed in and around the Regional City. However this can only be achieved if the focused growth points envisaged in option3 within the City Centre, the Canal Road Corridor and SE Bradford are pursued. It is also only deliverable if a significant contribution of green belt including an urban extension at Holme Wood is assumed. The Council has searched for alternative options which put less stress on the infrastructure and green belt of the Bradford but none are apparent. Alternative approaches not progressed include:
- The options of allocating higher quantum to the Principal Towns are ruled out by a combination environmental constraints (particularly Ilkley), and deliverability constraints (particularly Keighley).
 - The option of allocating higher quantum to local Growth Centres has been ruled out as two of the originally identified growth centres at Menston and Burley in Wharfedale are subject to the need to limit development due to their proximity to the S Pennine SPA;
 - The option of allocating higher quantum to the Local Service Centres, while theoretically possible on the basis of land supply, would not be a sustainable approach;

National Planning Policy Framework

- 5.9. It is important that the Core Strategy's approach to meeting housing need and the resultant housing distribution accords with the principles within the NPPF. The principles within the NPPF are by definition broad but the table below shows how the Council's approach aligns with what the NPPF is seeking to achieve:

NPPF Extract	Application to Policy HO3 Settlement Targets and Overall Housing Distribution
<p>Core Planning Principles – Planning Should:</p> <ul style="list-style-type: none"> • take account of the different roles and character of different areas, promoting the vitality of our main urban areas • actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and • contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; 	<p>This supports the use in the Core Strategy of a settlement hierarchy since the settlement hierarchy itself reflects the different roles, character and function of the different settlements. It also supports the approach to focus development in the main urban areas to improve their vitality. The settlement hierarchy and the resulting housing distribution focusing the majority of development on the larger settlements will help make best use of the existing public transport network.</p> <p>The settlement targets are formulated to make maximum use of the available and deliverable supply of previously developed land.</p>
<p>30. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of Transport.</p>	<p>By setting settlement targets which focus nearly 70% of housing development within or adjoining the Regional City, the need to travel and therefore greenhouse gas emissions will be lower than that under a more dispersed distribution of development. Easing congestion via focused investment in the transport network will as a result be a key priority within the Regional City.</p>
<p>52. The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns</p>	<p>This recognises that there will be occasions where extensions to the built up area of different scales will be needed and it is perfectly possible for such extensions to provide sustainable locations for development. This supports the Councils proposal for an urban extension at Holme Wood.</p>
<p>55. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p>The proposal for limited development in most of the Districts smaller rural and semi rural settlements will help meet local housing need and maintain and support</p>

<p>83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.</p>	<p>services.</p> <p>The exceptional circumstances justifying change to the green belt have been clearly set out within the Core Strategy.</p>
<p>100. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.</p> <p>100. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:</p> <ul style="list-style-type: none"> ● applying the Sequential Test; <p>101. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding.</p> <p>102. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:</p> <ul style="list-style-type: none"> ● it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, 	<p>The SHLAA has built flood risk into its analysis and into the suitability test by ruling sites as unsuitable where they fall within the functional flood plain (zone 3b) and identifying sites within zone 3a as only potentially suitable. Further analysis of the land supply has been undertaken and is presented in Appendix 4 to this paper. This shows that the only settlements / areas where the housing targets would require any contribution from sites within flood zone 2 or 3 are in Bradford City Centre and the Canal Road Corridor. In other settlements targets can be met solely by sites within flood zone 1.</p> <p>Within the City Centre and Canal Road Corridor, the case for utilising a limited supply of land in higher flood risk zones is justified by the lack of sustainable alternatives elsewhere in the District (land supply constraints) the results of the HRA and the fact that any reduction in targets in the City Centre and Canal Road Corridor would need to be met by increased green belt release elsewhere – this would not be sustainable and would act to increase travel by car, increase greenhouse gas emissions. Finally and most crucially the planned growth within these urban areas are key regeneration priorities.</p>
<p>111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land) provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.</p>	<p>Settlement targets have assumed the full use of all deliverable and developable land supply as set out in the SHLAA. There is no alternative settlement target which, based on current data, would deliver a greater concentration on PDL.</p>
<p>119. The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives</p>	<p>The settlement targets have been adjusted to reduce the amount of development in towns and villages within the</p>

is being considered, planned or determined.	SPA 2.5km buffer zone.
159. Paragraph 159 states that Local planning authorities should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.	A SHLAA has been prepared and the data within it has been utilised along with other evidence to formulate the approach within Policy HO3.

Evidence

SHLAA and Growth Assessment

- 5.10. The earlier sections of this paper have already outlined the nature, role and importance in general terms of a number of evidence base documents. Paragraphs 4.20 to 4.30 deal with the SHLAA and SHLAA update, the methodology used and the results and their implications for the distribution of development on a sub area of settlement tier basis. Paragraphs 4.31 to 4.36 explain the role of the Growth Assessment and how it has revealed a significant number of strategic parcels which are potential locations for development and which will supplement the land supply in the SHLAA once the second SHLAA update is completed.
- 5.11. The Growth Assessment has also assessed the relative sustainability of the different settlements as locations for growth and has given support to a focus on an urban extension in SE Bradford.
- 5.12. The section below gives, on a settlement by settlement basis, an indication of the most critical factors in determining the housing target and further details relating to the SHLAA and Growth Assessment are where applicable discussed.

The Habitats Regulations Assessment (HRA) & Associated Survey Work

- 5.13. Under 'the Habitats Regulations', the Council is required to undertake an assessment of the policies and proposals in the plan, to ensure that these would not lead to unmitigatable adverse effects on the ecological integrity of internationally important habitats or species within or close to the District; particularly in relation to the South Pennine Moors Special Protection Area (SPA). Consultants Urban Edge have been commissioned by the Council to carry out the HRA of the plan and an initial draft report in May 2013 concluded that the development proposed in the Core Strategy as configured at the Further Engagement Draft stage, could have adverse effects on the protected habitats and associated birds due to the potential extent of development located close to the moors and through increases in population.
- 5.14. The initial report advocated the use of a number of defined buffer zones to shape policy with the closest zone, the area within 400M of the SPA boundary requiring greatest restrictions on development. Of more significance for the distribution of housing development and the settlement targets was a proposed 2.5KM zone where the consultants suggested a precautionary approach and that development should be scaled back in order to avoid impact on key habitats which support the species for which the SPA & SAC are designated. It was made clear that the 2.5KM zone was not however one where all development would need to be ruled out. Moreover not all of the land within the 2.5KM zone was likely to be of key importance in supporting the SPA. As a result the consultants advised the commissioning of a range of further research to better understand which areas within the 2.5KM buffer zone were most significant in terms of incidences of protected birds and incidence of key and sensitive habitats. This would then enable both bird and key habitats observations to be mapped and compared in their location with the range of potential development sites within the SHLAA. At no stage did the consultants suggest that

their work could give an answer to a specific quantum of development which would be appropriate within a given settlement.

5.15. Based on this advice the Council's approach was twofold:

- To seek a significant reduction in the settlements most severely affected so that both the direct affects from development sites and indirect affects relating to population increase and associated increased recreational activity were removed or reduced to acceptable levels;
- To reduce settlement targets to a level where those targets could – if necessary – be met entirely or predominantly from sites not identified as containing key sensitive habitats or where the species for which the SPA has been designated where not observed.

5.16. The settlement housing targets within the Publication Draft have therefore been informed by the full HRA and the survey and mapping work underpinning it. The settlements most affected by the SPA 2.5Km buffer zone and with consequent adjustments to their housing targets are:

- Addingham
- Ilkley
- Burley In Wharfedale
- Menston
- Silsden (eastern part)

5.17. The reductions in housing targets in the settlements identified above have inevitably had to be 'paid for' via a modest redistribution back to the Regional City which has been made possible as a result of the increase developable land supply in the SHLAA Update and the conclusions of the Growth Study which have identified additional potential green belt releases around the main urban area in addition to those already within the SHLAA.

Other Evidence

5.18. Flood risk - the approach within Policy HO3 has been informed by analysis of flood risk in accordance with the NPPF. As set out in the table above the settlement targets in all but the City Centre and Canal Road Corridor can be met entirely from land in the lowest flood risk category i.e. zone 1. The data underpinning this is set out in Appendix 4 below.

5.19. Transport and Infrastructure – paragraphs 5.3.46 to 5.3.48 of the Core Strategy Publication Draft discuss the role of Transport and Infrastructure in developing the spatial approach and the evidence collected. In both cases significant challenges are apparent both in upgrading infrastructure and in developing transport corridor based initiatives to improve the efficiency of the transport network. However the Infrastructure Plan confirms that there are no major infrastructure issues which cannot be resolved given careful planning and adequate resources. Both studies show that infrastructure and transport network pressures and issues are not confined to any one area of the District. Therefore these two factors have not been major or defining ones in determining the distribution of development.

The Publication Draft

5.20. The revised Policy HO3 as presented within the Publication Draft in the Council's view represents the most sustainable option possible if the needs of the District as a whole are to be met. It reflects Government guidance within the NPPF, the evidence base in particular the SHLAA update, the Growth Study, and the HRA. It reflects the Council's key regeneration programmes and initiatives within Bradford City Centre and the Canal Road Corridor and provides a solution which directs development away from the areas of highest flood risk. The policy and relevant text is extracted and set out below:

Policy HO3: Distribution of Housing Development

A. In accordance with the vision and spatial principles set out in this Plan, the forthcoming Allocations, Bradford City Centre and Shipley & Canal Road DPD's will allocate sufficient land to meet the residual housing requirement of 42,100 for the district between April 2013 and April 2030. This requirement will be apportioned as follows:

3,500	(8% of the district total)	within the Bradford City Centre Area AAP
3,200	(8% of the district total)	within the Shipley & Canal Road Corridor AAP
35,400	(84% of the district total)	within the Allocations DPD

B. The Apportionments between the different settlements of the district will be as follows:

The Regional City of Bradford (28,650) Divided as follows:

Bradford City Centre	3,500	Bradford NE	4,700
Canal Road	3,200	Bradford SW	5,500
Shipley	1,250	Bradford NW	4,500
Bradford SE	6,000		

The Principal Towns (6,700) Divided as follows:

Ilkley	800	Bingley	1,400
Keighley	4,500		

Local Growth Centres (3,400) Divided as follows:

Queensbury	1,000	Steeton With Eastburn	700
Silsden	1,000	Thornton	700

Local Service Centres (3,350) Divided as follows:

Addingham	200	East Morton	100
Baildon	450	Harden	100
Burley In Wharfedale	200	Haworth	500

Cottingley	200	Menston	400
Cullingworth	350	Oakworth	200
Denholme	350	Oxenhope	100
Wilsden	200		

Summary

- 5.21. Paragraphs 5.3.39 of the Core Strategy indicate in some detail the criteria which have shaped the settlement targets within Policy HO3. They describe a process whereby initial baseline targets were derived based on the size of population within each settlement and then varies according to a range of criteria including land supply, the growth assessment results, regeneration priorities, and environmental constraints. The housing target for each settlement in this baseline was related to the proportion of the District's population within the settlement boundary as defined in the Core Strategy. Thus for example a settlement with 10% of the total population of all the settlement areas combined would be allocated 10% of the District wide target of 42,100.
- 5.22. A combination of census data and GIS software was used to derive population estimates. The estimates of the 2011 Census population for each of the Core Strategy settlement areas were produced using 2011 Census Output Area population weighted Centroids. Population weighted centroids represent how the population is distributed within each of the Output Areas summarised by a population figure at a single spatial point. The location of the point is calculated using a Median-centred formula which is less affected by households which may be located away from the rest of the households in the output area.
- 5.23. The Output Area population centroids which fell within each of the settlement area boundaries were selected using ARCGIS software and the population figures aggregated to give a best fit estimate of the population for each settlement area. It should be noted that small pockets of the population of the District will be scattered outside settlement area boundaries so the settlement area totals will not add up to the District wide population based on the local authority boundary.
- 5.24. The method described above - the population centroid method - is set out as best practice by the Office for National Statistics to produce consistent and comparable area based statistics.
- 5.25. The section below now gives an indication of key data and key factors which have underpinned the housing targets on a settlement by settlement basis. It also highlights how and why targets have changed since the CSFED.
- 5.26. Taken together, and bearing in mind the many sometimes competing drivers which either constrain or encourage growth, the targets in the Council's view reflect the most sustainable option for meeting the District's very substantial housing requirement.

SETTLMENT TABLE NOTES

DATA / INFORMATION	
CSFED TARGET	The settlement target within the Core Strategy Further Engagement Draft
PD DRAFT TARGET	The settlement target within the Core Strategy Publication Draft (PD)
CSFED TO PD CHANGE	Indicates whether the target has been reduced or increased in the PD
POPULATION PROPORTIONATE TARGET (PPT)	The baseline population proportionate target (PP)
PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	Indicates whether the settlement target in the Publication Draft is higher or lower than the population proportionate target
TOTAL SHLAA CAPACITY	Taken from the SHLAA update – deliverable and developable land capacity including residual
ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	Estimate of the number of dwellings from green belt sites which may be required to meet the Publication draft target
G BELT AS % OF SUPPLY FOR PD TARGET	The green belt contribution as a % of the settlement target
KEY FACTORS IN FINALISING THE SETTLMENT TARGET	
Settlement Hierarchy	The Core Strategy directs growth according to the hierarchy – higher order settlements are envisaged to receive higher targets unless other factors indicate otherwise.
Land Supply	Indicates whether the land supply capacity taken from the SHLAA update is higher or lower than the population proportionate target
Growth Assessment	Indicates whether the growth assessment indicates growth potential – based on the growth assessments view on how sustainable the settlement is and the extent of strategic parcels which have been identified
Regeneration Priority	Self explanatory.
Flood Risk	Indicates whether the proposed targets in the Publication Draft can be met solely via sites within flood zone 1
HRA	Indicates whether the settlement lies wholly or substantially within the 2.5km buffer zone.

Bradford City Centre

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR PD TARGET
28,000	28,650	+650	293	HIGHER	2,752	0	0

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	-	▲	▼	-

KEY	
Higher	▲
Lower	▼

Commentary

The target for the City Centre reflects its status as a key regeneration area within the District. The target lies above the currently identified SHLAA capacity, however it is considered that there is substantial potential within the City Centre over and above that currently within the SHLAA. This includes small sites and disused buildings currently below the SHLAA site threshold, and sites whose delivery is currently in abeyance in the current market conditions. The targets assumes that the prospects for investment within the centre will improve as regeneration gathers pace a key element of which will be the delivery of the Westfield shopping centre scheduled for opening at the end of 2015. Flood risk is an issue which affects some sites within the City Centre.

Shipley and Canal Road Corridor

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
3,000	3,200*	+200	115	HIGHER	3,600	0	0

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	-	▲	▲	-

KEY	
Higher	▲
Lower	▼

Commentary

The Canal Road Corridor is one of the Council's key regeneration priorities. Land supply is sufficient to meet the proposed target and reflects the ongoing and detailed master planning work already undertaken in support of the AAP. The target is similar to that advocated in the CSFED albeit the area covered by the Corridor has been redefined and is now larger than that at CSFED stage. Flood risk is an issue which affects some sites within area.

* Note – Publication draft slightly amended / enlarged the Canal Rd Corridor Area to include part of Shipley area.

Shipley

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
2,000	1,250*	-750	1,485	LOWER	1,283	513	41

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	-	-	▲	▲	-

KEY	
Higher	▲
Lower	▼

Commentary
<p>The Shipley target in the Publication Draft is lower than that in the CSFED largely due the re-drawing of the boundary of the Shipley and Canal Road Corridor area. The target is well aligned to the Population Proportionate Target, however would require a significant green belt contribution. Given land supply constraints it is difficult to see a higher target being possible for this settlement and site selection and delivery will need to be mindful of possible impacts on the setting of the Saltaire World Heritage Site.</p>

*Note – Shipley area reduced in the Publication draft as a result of re-drawing of the Canal Rd Corridor boundary.

Bradford SE

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
6,000	6,000	-	4,878	HIGHER	6,607	2654	44

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	▲	▲	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

Bradford SE encompasses the proposed urban extension at Holme Wood and is a key regeneration priority within the district. This together with the available land supply produces a target well in excess of the Population Proportionate Target (PPT). Based on the SHLAA, the area has a high capacity for new development both on existing allocated sites and on further redevelopment opportunities identified as infill development in and around Holme Wood. The area is in a sustainable location and new development from green belt releases will help deliver new local amenities for the existing population. The results of the growth study supports the proposals for an urban extension in this area – it identifies the area as being of less landscape value than other parts of the District. It is also relatively unconstrained.

Bradford North East

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
5,000	4,700	-300	7,436	LOWER	5,171	910	19

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▼	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The proposed target for this area has been reduced slightly in comparison to the CSFED to reflect the constraints on available land supply. As a result the proposed target is well below the Population Proportionate Target. The SHLAA indicates that there is still a sufficient supply of current sites and infill to account for at least 2000 new homes on unconstrained sites. However a further increase in the target is not desirable as the supply already includes some sites identified as green space and there is a need to constraint green belt releases to a level which would not compromise the strategic functioning of the green belt between Leeds and Bradford.

Bradford South West

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PP TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
4,500	5,500	+1000	7,894	LOWER	6,180	1,306	24

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▼	▲		▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
<p>The proposed target has been significantly increased since the CSFED. However the new and higher target still lies well below the Population Proportionate Target. Potential land supply, though substantial lies well below the level necessary to support a target of 7000 homes. Nonetheless the SHLAA indicates that there are a range of good development opportunities within the area – these include a number of existing housing sites from the RUDP and with permissions still waiting to be developed. Bradford SW also contains a large industrial area which is declining in popularity and consequently new additional opportunities from land recycling need to be further explored further. Some sites such as at Grattan and Initial Services are already coming forward and illustrate this point. The area is of generally low green belt and landscape value and there are few overall constraints. A number of small green belt releases could be considered for phase 2 but also development densities in the main urban area could be increased to ensure the best use is made of infill plots to reduce reliance on green belt,</p>

Bradford North West

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
4,000	4,500	+500	6,222	LOWER	4745	2,021	45

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▼	▲	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The proposed target has been slightly increased but still lies well below the PPT. Available land supply, though substantial is insufficient to meet the PPT of around 6000. Even achieving the target as proposed would require a contribution of around 2000 homes from the green belt. However there is substantial potential on the edge of the urban area and the results of the growth study support this view. Significant infrastructure investment would be required in this area to support growth including improvement to public transport and to schools capacity.

Ilkley

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
1,300	800	-500	1,194	LOWER	1,790	474	59

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	▼	-	-	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The proposed target for Ilkley has been significantly reduced since the CSFED largely on the back of the results of the HRA and the need to avoid impacts on the supporting habitats of the S Pennines SPA / SAC. The proposed target therefore now lies well below the Population Proportionate Target (PPT) and well below the available land supply indicated within the SHLAA. A further indicator of the need to reduce the target below the PPT is the fact that much of the capacity within the SHLAA lies in green belt locations around the edge of the town. There is a need to protect the setting and landscape value of its surrounds. In other respects however, the settlement is a sustainable location for some development and a range of shops and services and is a popular tourist destination.

Keighley

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
5,000	4,500	-500	4,066	HIGHER	5,223	1,632	36

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	▲	▲	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The proposed target in the Publication Draft has been slightly reduced to reflect the Population Proportionate Target (PPT) and potential issues relating to deliverability of sites and also the topography surrounding the town. The Local Plan Viability Study indicates that viability levels in the current market in parts of the area are marginal. Regeneration efforts and an uplift in the market will therefore be necessary to enable some sites within the urban area to come forward. For this reason, an increase in the target above the proposed levels would not be appropriate. There are nonetheless significant development opportunities within the urban area and the recycling of industrial and commercial premises is likely to continue to offer some potential. The proposed target would however require a significant green belt contribution based on currently developable land supply.

Bingley

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
1,600	1,400	-200	1,470	-	2,196	275	20

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	-	▲	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
<p>The proposed target has been reduced slightly to reflect the settlements proximity on the edge of the 2.5km buffer zone around the S Pennines SPA. The buffer zone however effects very few of the existing SHLAA sites and only impinges on the northern edge of the town. It nonetheless provides one reason why it would be difficult to increase the proposed target. Based on the SHLAA, Bingley has a reasonable capacity to accommodate around 1100 homes within the settlement although a proportion of this is on land that is currently protected and/or in use for other uses. A modest contribution from green belt sites would be required but there are several potential opportunities is sustainable locations .</p>

Queensbury

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PP TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
1,500	1,000	-500	734	HIGHER	1,748	334	33

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	▲	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
<p>Queensbury is identified in the Publication Draft as a Local Growth Centre in part due to its location close to the Regional City. The proposed housing target is therefore well in excess of what would be the case based on the PPT. Land supply is well excess of the proposed target but a cautious approach has been taken because of the extent of green belt which would be required to deliver the higher CSFED target and the potential landscape impacts which could occur. Nonetheless significant levels of development is supported by the results of the growth study.</p>

Silsden

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
1,700	1,000	-700	633	HIGHER	2,026	0	0

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	-	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

Silsden remains as a Local Growth Centre and area for significant housing development within the Publication Draft. However in the light of the HRA and the 2.5km buffer zone which impacts on the eastern edge of the town, the proposed target has been substantially reduced since the CSFED. The proposed level of development would not require any green belt releases due the presence of a substantial tract of land to the south and east of the town which is currently designated as safeguarded land in the RUDP.

Steeton With Eastburn

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
800	700	-100	346	HIGHER	885	168	24

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

Steeton with Eastburn has been identified as a Local Growth Centre within the Core Strategy and it has therefore been assigned a higher housing target than that indicated by the PPT. SHLAA land capacity is sufficient to meet this target.

Thornton

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	HIGHER OF LOWER THAN PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
700	700	-	483	HIGHER	864	212	30

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▲	▲	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

Thornton is identified as a Local Growth Centre within the Core Strategy and has therefore been assigned a higher target than the PPT. The SHLAA indicates that Thornton has a healthy supply of sites which are suitable now together with safeguarded land. Some limited green belt release will be required to meet the proposed target. Thornton is well placed to link to transport links in the city centre.

Addingham

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
400	200	-200	263	LOWER	1,153	0	0

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	▼	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
<p>The target for Addingham has been significantly reduced since the CSFED as a result of the HRA. However the remaining target, based on the available sites should be able to be delivered without impinging on the most sensitive areas indicated in the HRA survey work. No green belt would be required to meet the revised target.</p>

Baildon

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
550	450	-100	1,351	LOWER	884	77	17

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▼	▼	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The target for Baildon has been reduced slightly since the CSFED and now lies well below both the PPT and the SHLAA land supply. A cautious approach to the setting of the target is warranted by a number of factor including the sensitive landscape context to the north of the settlement and the fact that the northern fringe of the settlement lies within the 2.5km SPA buffer zone.

Burley In Wharfedale

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
500	200	-300	518	LOWER	1,094	150	75

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	▼	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
<p>The target for Burley has been significantly reduced since the CSFED as a result of the HRA. The settlement has also been downgraded to tier 4 of the settlement hierarchy. The target now lies well below the level which would be set if based on the Population Proportionate Target. However the remaining target, based on the available sites should be able to be delivered without impinging on the most sensitive areas indicated in the HRA survey work. Some green belt would be required to meet the target given limited opportunities within the village.</p>

Cottingley

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
300	200	-100	395	LOWER	681	163	82

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
<p>The modest target for Cottingley reflects the size and nature of the settlement, and its position within the settlement hierarchy and the need to protect key areas of green belt which maintain the separation between Cottingley and surrounding settlements. The target has been reduced slightly since the CSFED to reflect the overall aim of increasing the emphasis on more sustainable locations in particular the main urban area. Although SHLAA capacity lies well above the proposed target it is not considered that it would be a sustainable option to increase the target.</p>

Cullingworth

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PP TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
200	350	+150	215	HIGHER	241	70	20

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
<p>The target for Cullingworth has been increased since the CSFED largely as a reflection of a number of development opportunities within the settlement some of which have arisen since the start of the SHLAA update. The SHLAA land capacity figure does not therefore fully reflect the potential within and adjoining the settlement. Although not suitable for larger scale development, Cullingworth nonetheless performed well in the Growth Assessment and has a wider range of services and facilities than some settlements within this tier of the settlement hierarchy. It has a number of existing local amenities including primary and secondary schools, shops and local employment.</p>

Denholme

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
450	350	-100	225	HIGHER	848	82	24

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The target has been reduced slightly since the CSFED to reflect the overall aim of increasing the emphasis on more sustainable locations in particular the main urban area. It still however lies above the level which would be set if based on the Population Proportionate Target. Denholme has a number of sites which have existing permissions and could if required be delivered in the early part of the plan period.

East Morton

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
150	100	-50	109	-	301	82	82

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	▼	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
The target for East Morton is small and reflects its size and the fact that it is located within the SPA 2.5km buffer zone.

Harden

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
150	100	-50	133	LOWER	86	41	41

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▼	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The target for Harden is a modest one which reflects its size and its position within the settlement hierarchy. It also reflects the low level of land supply within the SHLAA. Few land recycling opportunities remain in the village and even the small target envisaged may require a small green belt release.

Haworth

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
600	500	-100	483	-	696	52	10

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	▼	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The proposed target has been reduced slightly since the CSFED and now closely follows the Population Proportionate Target which in turn reflects the size of the settlement. The proposed target could be met by existing sites and opportunities within the settlement and only a little more in settlement potential would have to be found to avoid any need for green belt release.

Menston

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
900	400	-500	362	-	1,167	0	0

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	▼	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

Most, although not all of the village and adjoining land lies within the SPA 2.5km buffer zone and as a result, Menston's proposed housing target has been more than halved. The settlement has also been downgraded to tier 4 of the settlement hierarchy. The remaining target of 400 new homes is capable of being met without any need for green belt release and is based on the housing sites allocated in the RUDP at Derry Hill and Bingley Road.

Oakworth

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
250	200	-50	315	LOWER	496	158	79

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	▼	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

The proposed target has been reduced slightly since the CSFED and now lies below the target which would result from the Population Proportionate Target. This reflects a cautious approach since part of the village lies within the 2.5km buffer zone of the S Pennines SPA. Even though a small target, its realisation would require a significant contribution from green belt.

Oxenhope

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
150	100	-50	155	LOWER	51	81	81

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▼	▼	-	▲	▼

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary
The proposed target has been reduced slightly since the CSFED and lies slightly below the Population Proportionate Target which in turn reflects the size of the settlement. Furthermore the SHLAA has only identified very limited development opportunities in the area.

Wilsden

CSFED TARGET	PD DRAFT TARGET	CSFED TO PD CHANGE	POPULATION PROPORTIONATE TARGET (PPT)	PD TARGET - HIGHER OR LOWER THAN THE PP TARGET	TOTAL SHLAA CAPACITY	ESTIMATED GREEN BELT REQUIRED TO MEET CSPD TARGET	G BELT AS % OF SUPPLY FOR CDPD TARGET
300	200	-100	325	LOWER	936	57	28

KEY FACTORS IN FINALISING THE SETTLEMENT TARGET					
Settlement Hierarchy	Land Supply	Growth Assessment	Regeneration Priority	Flood Risk	HRA
▼	▲	-	-	▲	-

KEY	
Higher	▲
Lower	▼

SHLAA Land Supply Commentary

In line with the aim of increasing the emphasis on development in the urban area and more sustainable locations, the target for Wilsden has been reduced and lies a little below the target which would result from the Population Proportionate Target. The SHLAA contains substantial tracts of land within the green belt submitted as part of the call for sites but the nature of the village, limited services and facilities and a narrow and constrained local road network all act against the setting of a higher target.

APPENDIX 1 – Sustainability Appraisal (SA) ANALYSIS OF THE 4 SPATIAL OPTIONS (FURTHER ISSUES AND OPTIONS STAGE 2008)

Spatial Option	Housing Quantums			SA Summary
<p>1. RSS Settlement Hierarchy</p> <p>This option applies the 3 tier settlement hierarchy of the regional city, 2 principal towns of Keighley and Ilkley and all other settlements being designated as Local Service Centres</p>	<p>Sub Regional City Principal Towns (x2) Local Service Centres (x18)</p>	<p>65% 30% 5%</p>	<p>32,500 15,000 2,500</p>	<p>Levels of development proposed in Ilkley and Keighley could have more detrimental impact on biodiversity and sensitive landscapes, particularly South Pennine Moors SPA, than other options. Locations for future housing would be Bradford, Shipley, Baildon, Ilkley and Keighley, however could be difficult to identify allocations on scale needed that would bring people close to existing services. Low levels of development in local service centres limits potential to cater for community needs. Locations for employment would lead to continuation of existing journey options and modes of travel. This option underplays the potential of Airedale.</p>
<p>2. Continuation of the RUDP</p> <p>This option included growth targeted in Local Service Centres of Queensbury, Thornton, Silsden, Burley, Menston, Denholme and Baildon.</p>	<p>Sub Regional City Principal Towns (x3) Local Service Centres (17)*</p> <p>*but development within this tier focused on just 8 of the villages.</p>	<p>50% 30% 20%</p>	<p>25,000 15,000 10,000</p>	<p>Levels of development proposed for settlements close to South Pennine Moors SPA could have more detrimental impact on biodiversity and sensitive landscapes. Impact on heritage assets and local distinctiveness also needs to be considered. Wider dispersal makes it more difficult to promote use of on-site renewable energy. This option offers widest choice of locations for future housing and ability to influence house types and affordability. It reduces pressure on services but limits scope for new facilities from development gain. It may attract high levels of overall investment to locations favoured by market and improve ability to attract high quality jobs, but could limit resources for areas in need of regeneration. Dispersal of locations for employment and housing could lead to longer journeys.</p>
<p>3. Focused Growth Points Around Bradford</p> <p>Sub Regional City – a significant focus on development within the Regional City, but with housing growth points at Holme Wood,</p>	<p>Sub Regional City Principal Towns (x2) Local Centres (x18)</p>	<p>70% 20% 10%</p>	<p>35,000 10,000 5,000</p>	<p>Environmental impact of strategic land releases at growth points would need to be assessed. Problems of poor air quality due to traffic congestion could become worse. Focusing development at growth points would help promote on-site renewable energy. This option offers residents a more limited range of locations for housing. There would be greater opportunities for pooling development gain to achieve improved facilities, however a significant influx of people</p>

the City Centre, Shipley and Canal Road Corridor and Esholt.				into a few communities could put pressure on social cohesion. It could reduce levels of overall investment attracted to district as seeks to limit growth in locations most favoured by market and also underplays potential of Airedale. Journeys to employment should be relatively short, but not necessarily readily achievable by sustainable means within existing transport capacity and infrastructure
<p>4. Dispersed Growth Points</p> <p>This option maintains a relatively high level of concentration on the regional city and retains the 4 housing growth points in Bradford but disperses a little more development to the smaller settlements and in particular to a selected number of the larger villages termed 'local growth centres' - Queensbury, Thornton, Silsden, Steeton, Burley, Menston, and Bingley.</p>	<p>Sub Regional City Principal Towns (x2) Local Growth Centres (x7) Local Service Centres (x11)</p>	<p>65% 10% 20% 5%</p>	<p>32,500 5,000 10,000 2,500</p>	<p>Environmental impact of strategic land releases at growth points would need to be assessed, particularly impact of identifying local growth points on South Pennine Moors SPA, sensitive landscapes and local distinctiveness. Residents are offered a choice of potential locations for housing at identified growth points, with limited new provision in Ilkley and Keighley meaningless change to housing stock here. More focused development would result in greater pressure on infrastructure and a significant influx of people into a few communities. This option seeks to make maximum use of sustainable transport corridors and wider connectivity links, however this could mean less support for major facilities and regeneration proposals in city centre. It recognises the potential in Airedale.</p>
<p>CSPD</p>	<p>Sub Regional City Principal Towns (x3) Local Growth Centres (x4) Local Service Centres (13)</p>	<p>68% 16% 8% 8%</p>	<p>28,650 6700 3400 3350</p>	<p>The Publication Draft adopts a blend of the above approaches. Concentration on the Regional City is only possible presuming around 7000 homes within the green belt and the delivery of the City Centre, Canal Road corridor and SE Bradford growth areas. Growth in the Principal Towns constrained by land availability and deliverability in Keighley, environmental assets (HRA, landscape around Ilkley) and land supply and need to maintain green belt separation around Bingley. Number of Local Growth Centres reduced due to the need to reduce development in proximity to the HRA.</p>

APPENDIX 2 – COMPARISON OF DISTRICT WIDE LAND SUPPLY WITHIN THE SHLAA AND SHLAA UPDATE

	SHLAA 1		SHLAA 2 (update)	
	Yield	%	Yield	%
Suitable Now	16640.5	38%	19493.5	36%
Potentially Suitable – Local Policy constraints	25514	58%	33239.5	62%
Potentially Suitable - Green Belt (A sub category of the local policy constraints)	12803	29%	19000	35%
Potentially Suitable – Physical constraints	1897	4%	978	2%
Total	44051.5	100%	53708	100%
Short Term*	7267	16%	8554	16%
Medium Term	21194.5	48%	27432	51%
Long Term	10122.5	23%	13872	26%
Residual	5467.5	13%	3850	7%
Total	44051.5	100%	53708	100%
PDL consolidated*	15078	34%	18067	34%
Greenfield*	28973.5	66%	35641	66%
Total	44051.5	100%	53708	100%

APPENDIX 3 – SHLAA BASED CALCULATION OF HOW MUCH GREEN BELT MAY BE REQUIRED TO MEET THE HOUSING REQUIREMENT

	Total Deliverable and Developable Capacity Within SHLAA					Core Strategy Publication Draft Policy HO3 Target (No and % of District Total)		Estimated Max Green Belt Contribution Needed		Green Belt Capacity Within SHLAA (Includes Residual)
	Total Incl. Residual	% Of District Wide Total	A - Total Not Affected By Policy or Physical Constraints (Suitable Now)	B - Total Affected By Policy / Physical Constraints Excl G Belt	C - Total Affected By Policy or Physical Constraints Excl G Belt Reduced By 1/3			No	%	
Total - Regional City	30,338	56.5	13,703	9,241	6,099	28650	68.1	7404	26	7395
City Centre	2,752	5.1	2,523	229	151	3500	8.3	0	0	0
Canal Rd Corridor	3,600	6.7	605	2,995	1,977	3200	7.6	0	0	0
NE	5,171	9.6	2,266	2,309	1,524	4700	11.2	910	19	596
SE	6,607	12.3	2,522	1,249	824	6000	14.3	2654	44	2836
SW	6,180	11.5	3,353	1,274	841	5500	13.1	1306	24	1553
NW	4,745	8.8	1,955	794	524	4500	10.7	2021	45	1997
Shipley	1,283	2.4	480	391	258	1250	3.0	513	41	413
Total - Principal Towns	9219	17.2	2895	2159	1425	6700	15.9	2380	36	4165
Ilkley	1,790	3.3	264	95	62	800	1.9	474	59	1431
Keighley	5,233	9.7	1,657	1,836	1,211	4500	10.7	1632	36	1741
Bingley	2,196	4.1	975	229	151	1400	3.3	275	20	993
Total - Local Growth Centres	5,521	10.3	1,494	2,315	1,528	3400	8.1	713	21	1713
Queensbury	1,748	3.3	512	234	154	1000	2.4	334	33	1002

Silsden	2,026	3.8	263	1,624	1,072	1000	2.4	0	0	139
Steeton	885	1.6	294	362	239	700	1.7	168	24	229
Thornton	864	1.6	426	95	63	700	1.7	212	30	343
Total - Local Service Centres	8,631	16.1	1,311	1,505	993	3350	8.0	1,011	30	5816
Addingham	1,153	2.1	0	476	314	200	0.5	0	0	677
Baildon	884	1.6	334	60	40	450	1.1	77	17	490
Burley	1,094	2.0	0	76	50	200	0.5	150	75	1018
Cottingley	681	1.3	15	33	22	200	0.5	163	82	633
Cullingworth	241	0.4	85	70	46	350	0.8	70	20	87
Denholme	848	1.6	139	195	129	350	0.8	82	24	514
East Morton	301	0.6	19	0	0	100	0.2	82	82	282
Harden	86	0.2	8	78	51	100	0.2	41	41	0
Haworth	696	1.3	191	390	257	500	1.2	52	10	115
Menston	1,167	2.2	401	0	0	400	1.0	0	0	766
Oakworth	496	0.9	42	0	0	200	0.5	158	79	454
Oxenhope	51	0.1	20	0	0	100	0.2	81	81	31
Wilsden	936	1.7	59	128	84	200	0.5	57	28	749

Estimated Green Belt Required

CPPD Housing Target Minus A (SHLAA Capacity Suitable Now) **Minus B** (SHLAA Capacity Affected By Policy or Physical Constraints Excl G Belt Reduced By 1/3)

All SHLAA capacity categorised as suitable now is compliant with current strategic policy within the RUDP and has been assessed as deliverable or developable.

SHLAA capacity on sites which have been categorised as potentially suitable have been assessed as developable but the contribution from this element has been discounted by 1/3 on the assumption that some sites will be retained in their current use in the Local Plan, or may be required and designated for other non housing uses.

APPENDIX 4 – SHLAA CAPACITY BY FLOOD RISK ZONE AND INDICATION OF HOW MANY HOMES NEEDED TO MEET SETTLEMENT TARGETS BY FLOOD RISK ZONE

	Publication Draft target	Total SHLAA 2 Capacity	SHLAA Capacity Within Flood Zone 1	SHLAA Capacity Within Flood Zone 2	SHLAA Capacity Within Flood Zone 3a	Estimated Flood Zone 1 Contribution To Meet Core Strategy Settlement \Target	Estimated Flood Zone 2 Contribution To Meet Core Strategy Settlement \Target	Estimated Flood Zone 3a Contribution To Meet Core Strategy Settlement \Target
						No.	No.	No.
Settlement								
City Centre	3500	2752	1616	228	908	1616	228	908
Canal Rd	3200	3600	3097	280	223	2626	265	111
NE/Esholt	4700	5171	5152	19	0	4700	0	0
SE/Holmewood	6000	6607	6534	45	28	6000	0	0
SW	5500	6180	6066	51	63	5500	0	0
NW	4500	4745	4745	0	0	4500	0	0
Shipley	1250	1283	1,024	44	215	1250	0	0
Total	28650	30338	28,234	667	1437	26192	493	1019

Ilkley	800	1789.5	1365.5	59	365	800		0		0
Keighley	4500	5233	4951	46	236	4500		0		0
Bingley	1400	2196	2031	108	57	1400		0		0
Total	6700	9,219	8347.5	213	658	6700		0		0

Queensbury	1000	1747.5	1747.5	0	0	1000		0		0
Silsden	1000	2025.5	1834.5	39	152	1000		0		0
Steeton	700	884.5	713.5	83	88	700		0		0
Thornton	700	863.5	863.5	0	0	700		0		0
Total	3400	5,521	5,159	122	240	3400		0		0

Addingham	200	1153	1072	67	14	200		0		0
Baildon	450	883.5	737.5	8	138	450		0		0
Burley	200	1094	977	79	38	200		0		0
Cottingley	200	681	679.5	1.5	0	200		0		0
Cullingworth	350	241	238	0	3	350		0		0
Denholme	350	848	834	0	14	350		0		0
East Morton	100	300.5	300.5	0	0	100		0		0
Harden	100	86	86	0	0	100		0		0
Haworth	500	695.5	664.5	3	28	500		0		0
Menston	400	1166.5	1145.5	5	16	400		0		0
Oakworth	200	495.5	495.5	0	0	200		0		0
Oxenhope	100	50.5	30.5	2	18	100		0		0
Wilsden	200	936	936	0	0	200		0		0
Total	3350	8,631	8,197	166	269	3350		0		0

District Total	42,100	53,708	49,883	1,203	2,623	39642		493		1019	
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Bradford District - Potential Land Supply By Flood Risk Zone

