



THE HOME BUILDERS FEDERATION

Date: 16th February 2015

Consultee ID: 105

Matter: 2

BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION

MATTER 2: SPATIAL VISION AND STRATEGIC OBJECTIVES

Is the Spatial Vision for Bradford justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the Plan, and are the Strategic Objectives appropriate, effective, justified and soundly based, and will they help to deliver the spatial vision of the Plan?

Question 2.1 Spatial Vision:

a. Does the Vision set out an appropriate, justified, effective and locally distinctive Spatial Vision for the future development of Bradford over the plan period in a clear and positive manner, providing a sound basis for the strategic policies in the Plan and giving sufficient strategic direction for the area to 2030, with an appropriate balance between economic growth, sustainable development, infrastructure requirements, environmental and social matters, and between brownfield and greenfield sites;

1. The HBF has no further comments at this stage.

b. Should the plan period be extended beyond 2030?

2. The NPPF, paragraph 157, indicates that plans should be drawn up over an appropriate timescale with a preference for 15 years. Whilst it would appear that the Core Strategy would achieve such a timescale significant elements of the plan will not, including the allocations and green belt releases, as they are delegated to subsequent documents.

3. The most recent Local Development Scheme (ref: SS054) identifies a very tight timescale in respect of the Core Strategy examination with the Inspectors report anticipated in April 2015, just a month after the opening of the examination, and adoption in July 2015. This appears challenging and if modifications are required is likely to be unrealistic. There is therefore a very real prospect that the Core Strategy will not provide a 15 year time horizon. This issue is, however, compounded by the fact that the Allocations DPD is not anticipated to be adopted until November 2017, meaning at best the full plan will only provide a time horizon of 13 years. Given the complexity of bringing sites forward, the time taken to prepare planning applications, secure permission and build out developments

(especially if these need to be co-ordinated with significant infrastructure investments) a minimum plan period of 15 years is advocated. The HBF recommends that the whole plan period be extended to at least 2032 to ensure a minimum 15 year time horizon from adoption of the Allocations DPD can be achieved. The extension of the plan period will require a commensurate amendment to the housing requirement and proposed allocations within the plan.

Question 2.2 Strategic Objectives:

- a. Does the Plan identify all the relevant Strategic Objectives, including those which have cross-boundary implications, and should any of the strategic priorities be amended to reflect the concerns of consultees?**
4. Within our comments upon the publication version of the plan the HBF recommended that Strategic Objective 2 be amended. In its current format it is contrary to the NPPF, paragraph 111, which seeks to encourage, not prioritise, the effective use of previously developed land. The HBF therefore respectfully request that the objective be amended to read;

*‘To ensure that the district’s **full** needs for housing, business and commerce are met in sustainable locations that reduce the need to travel and are well served by public transport and services, whilst ~~prioritising~~ **encouraging**, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced’.*

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