



THE HOME BUILDERS FEDERATION

Date: 16th February 2015

Consultee ID: 105

Matter: 3

BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION

MATTER 3: STRATEGIC CORE POLICIES

Is the Overall Approach and Key Spatial Priorities, the justification for the proposed Settlement Hierarchy, the principles of location of development, the general approach to the Green Belt, for Bradford, and the approach to development proposals in the South Pennine Moors Zone of Influence soundly based, effective, appropriate, deliverable, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with the latest national policy?

Question 3.1: Policy SC1 – Overall approach and key spatial priorities & Question 3.2 Policy SC4 – Settlement Hierarchy

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

Question 3.3 Policy SC5 – Location of Development

a. What is the justification for setting the priorities and criteria for locating new development; is it supported by evidence, appropriate and soundly based?

2. The HBF refers to our previous comments submitted upon the publication version of the plan.

b. Does the policy make the appropriate balance between prioritisation of brownfield land, use of brownfield land and windfalls, and greenfield land, and safeguarded land?

3. The HBF notes the approach to allocations that the Council intend to take, however the approach does not refer to the viability and deliverability of sites to ensure that the housing requirement is met. In this regard the HBF consider that undue emphasis is placed upon brownfield land within inner urban areas. The Council's 'Local Plan Core Strategy – Viability Assessment. Sept 13' (ref: EB045) identifies the serious challenges facing the Council in that much of Bradford and Keighley, which are anticipated to take the majority of growth, remain unviable under current market conditions (Table 4.4) even with no policy contributions.

c. How will sites be assessed and are the accessibility standards inflexible?

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

Question 3.4: Policy SC7 – Green Belt

a. Is the proposed approach to the Green Belt appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy (NPPF; ¶ 84), particularly in terms of:

i. identifying the exceptional circumstances necessary for using Green Belt land;

5. The HBF supports the need to review the Green Belt within Bradford. The NPPF is very clear that in developing Local Plans Councils should positively seek to meet their objectively assessed needs (paragraphs 14, 47, 159). The NPPF also requires a significant increase in the supply of housing. The Council has clearly illustrated through its 2013 SHLAA (ref: EB049) that it cannot accommodate all of the housing required without incursion into the Green Belt. Once the requirements for employment land are also considered the incursion into the Green Belt is the only realistic alternative. Given the requirement to meet the areas objectively assessed needs and the lack of credible alternatives the HBF considers this represents exceptional circumstances.

6. It is noted that footnote 9 to NPPF paragraph 14 indicates that Green Belt boundaries may be a restriction to other policies contained within the NPPF. However footnote 9 does not indicate that Green Belt boundaries should not be changed, rather that change should be controlled or limited. Paragraph 83 of the NPPF further notes that Green Belt boundaries can be altered through the plan making process and therefore recognises that Green Belts are not preserved in perpetuity.

7. In common with our comments upon objectively assessed housing needs (see our Matter 4a hearing statement and comments upon the publication version of the plan) the HBF consider that the Council may need to consider whether the proposed Green Belt releases are sufficient.

ii. demonstrating the need to promote sustainable patterns of development, including the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (NPPF; ¶ 84);

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

b. Whether there should be a full or selective review of the Green Belt, and would such a review be co-ordinated and agreed with neighbouring authorities?

9. It is noted that a Strategic Green Belt Review amongst Leeds City Region partners may be undertaken in the future. Whilst the HBF consider this would be a positive step there is no formal commitment or timetable for such work. It is therefore important that the Council deal with the issues of Green Belt release through the local plan, as such a full review is recommended.

c. What evidence is available to justify decisions to release particular areas of Green Belt for development?

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

d. Should the Green Belt review also include Safeguarded Land?

11. The NPPF, paragraph 83, is clear that LPAs must satisfy themselves that new Green Belt boundaries will not need to be altered at the end of the plan period. The plan, paragraph 3.103, identifies that the selective review will only last until 2030 unless significant windfall development occurs. The plan, however, does not intend to include safeguarded land meaning that a review of the Green Belt will be required at the end of the plan period. This is not considered to be planning positively and indicates that the Council is not confident in terms of its current housing requirement.

12. The HBF contend that the Council will need to consider identifying further Green Belt land to meet its objectively assessed housing needs and should include safeguarded land in order to meet longer-term development needs, stretching well beyond the plan period (NPPF paragraph 85). The lack of inclusion of such land will not only lead to uncertainty over Green Belt boundaries in the medium term but also reduce flexibility within the plan. The HBF consider that a positively prepared flexible plan, as required by the NPPF, would identify safeguarded land as well as the triggers for plan review to enable the release of such land were the current plan be found to be failing with regards housing supply. It is therefore recommended that consideration be given to the allocation of safeguarded land within the Site Allocations DPD to future proof the Green Belt boundaries.

Question 3.5 Policy SC8 – South Pennine Moors

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

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