

BRADFORD LOCAL PLAN CORE STRATEGY**EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)
(Representor ID: 423)*****Matter 4C: HOUSING REQUIREMENTS*****Preamble**

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

Persimmon Homes Site Interests in Bradford

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

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley
- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

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

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 4C, which covers Housing Provision, is contained in this statement. The key issue highlighted by the Inspector is:

“Is the approach to the distribution of housing development to the various towns and settlements in Bradford fully justified with evidence, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG?)”

6. We consider below the specific questions asked by the Inspector:

Policy HO3 – Distribution of Housing Development

a) Is there sufficient evidence available to justify the proposed distribution of housing development to the various towns and settlements in Bradford; and is the proposed distribution supported by the evidence?

7. The approach in Policy HO3 is to provide a broad indication of the distribution of dwellings within Bradford and its district with further details to be provided in subsequent allocating/detailed development plan documents.
8. In undertaking this exercise the Council has observed the requirement within each settlement based on expected population changes over the plan period, using 2011-based census and GIS software. The Council has then adjusted these figures to take into account various factors. These include:
 - Land supply (principally the evidence provided in the Strategic Housing Land Availability Assessment (“SHLAA”));
 - Growth Study;
 - HRA and South Pennine Moors Birds and Habitats Surveys;
 - Flood Risk; and

- Other factors (including maximising previously developed land/minimising Green Belt release/delivering affordable housing).
9. The effect of this is to boost housing numbers in areas such as in Bradford City Centre, Shipley and Canal Road Corridor, South East Bradford and Keighley. This appears to be at the expense of settlements such as Ilkley, Ben Ryhdding, Menston and other areas of Bradford and many Local Service Centres where housing is proposed to be constrained at a level below the identified need based on population.
 10. This is largely based on the results of the Council's *Habitat Regulations Assessment* work (SD/019-022) and its *Growth Assessment* (EB/047). We have concerns about this approach and outlined these in our responses to questions B and D below.
 11. On a general basis however we also have other concerns and whilst our client does not object in principle to the need to provide a broad range of distribution to various settlements within the Bradford and its district, it believes the Council's methodology and approach to the distribution of housing in Policy HO3 is flawed and unsound.
 12. The difficulty in distributing housing in this manner is that it is reliant to a large degree on future detailed/allocating development plan documents. As many of these documents are yet to exist, even in draft form, it is questionable how robust this policy is.
 13. Indeed using the Council's latest SHLAA update May 2013 (EB/049) (which is best data available outside of any draft allocations) shows that for South East Bradford in particular there is insufficient capacity to accommodate the required dwellings over the plan period (5,318 dwellings in comparison to the Council's target of 6,000 dwellings). It is also the case that Bradford City Centre also cannot demonstrate sufficient capacity (2,752 dwellings identified as opposed to the target of 3,500 dwellings through the Core Strategy). Even discounting this, there appears to be a heavy reliance on sites which have notable constraints. This emphasises that accurately establishing distribution is difficult to achieve without knowing more details of future allocations and so consequently the Council cannot fully justify their approach to Policy HO3.

b) Does the policy pay sufficient regard to viability considerations?

14. In formulating its proposed distribution of development within the Core Strategy, the Council undertook a *Growth Assessment* (EB/047) that has been produced to examine areas in and

around settlements that are subject to constraints. This however appears to largely ignore important factors such as viability considerations.

15. Our Client considers that without proper thought to viability it will be difficult for the Council to undertake their desired distribution of housing given many lower value areas of the district and certain previously developed sites will not be able to be delivered in the current market.
16. These concerns are echoed in the Council's own *Local Plan Viability Assessment* (EB/045) and its associated update (EB/046) which clearly identifies the viability challenges of delivering housing within large parts of Bradford and its district (see Figure 4.2 and Table 4.4 of the Viability Assessment and paragraphs 5.1.3 and 5.1.4 of the update). These are the areas which the Council are relying on for a notable proportion of their housing delivery.
17. Whilst our client appreciates that economic conditions and the housing market may improve in the future, there is a clear imperative for the Council to boost its housing supply within the shorter term (see paragraph 47 of the NPPF); not least given its historic under delivery of housing and its current inability to demonstrate a 5 year supply of deliverable housing land.
18. The Council therefore need to revisit its approach contained in Policy HO3 to better take into account the viability of development in certain areas of the district. As a minimum there needs to be flexibility built into the plan to ensure other areas of the district can accommodate any under-delivery from more viability compromised areas.

c) Does the policy pay sufficient regard to the infrastructure requirements (especially highways and transport modelling)?

19. We do not have specific comments in relation to this question but would maintain that the requirement for infrastructure should not be used to justify the delay in delivering much housing development in Bradford and its district. The advent of the Community Infrastructure Levy ("CIL") and continued use of S106 monies can appropriately contribute towards necessary infrastructure.

d) Does the policy pay sufficient regard to constraint policies (especially in Airedale and Wharfedale)?

20. One of the primary drivers for the distribution of dwellings outlined in the Core Strategy has been in relation to ecological considerations specifically those contained in the Habitats

Regulation Assessment. This is with reference to the impact of Special Protection Areas (“SPA”) and Special Areas of Conservation (“SAC”).

21. The approach taken and outlined in the Council’s *Habitat Regulation Assessment* work (SD/019-022) is to utilise a 2.5km buffer zone around the SPA/SAC boundary and for this to feed into and inform Policy HO3 (along with Policy SC8). The effect of this has led to a reduction in housing to key settlements such as Ilkley and constraining development in areas such as north Keighley.
22. We provide in the table below how different settlements differ between the *Further Engagement* draft of the Core Strategy (which we understand provided housing requirements based on population need) and those proposed in the current Core Strategy. The Council also highlight this in their *Background Paper 1* (SD/015).

	SHLAA 2 Capacity*	SHLAA Site / Birds & Habitats Comparison No of SHLAA Sites Affected	Revised Settlement Capacity	CSFED HO3 Target	CSPD HO3 Target	CSFED to CSPD Reduction	
						No	%
Ilkley	1,789	5	929	1,300	800	500	38
Burley	1,084	3	407	500	200	300	60
Menston	1,166	1	981	900	400	500	56
Addingham	1,153	1	722	400	200	200	50
Silsden	2,025	3	1031	1,700	1000	700	41
Keighley	5,233	0	5,233	5,000	4,500	500	10
Oakworth	495	2	289	250	200	50	25
Haworth	695	0	695	600	500	100	17
Oxenhope	50	0	50	150	100	50	33
Denholme	848	0	848	450	350	100	22
Bingley	2,196	1	1,753	1,800	1,400	200	13
E Morton	300	1	251	150	100	50	33
Thornton	863	0	863	700	700	0	0

23. Our previous representations highlighted the flaws which had been identified (both scientific and legal) in the preparation and application of the Appropriate Assessments which have been used to underpin Policy HO3 and as a result of these a lack of reasonable alternatives to the current approach had not been duly considered and that the policy was unduly restrictive in nature and went further than necessary to secure the protection of the relevant European sites.
24. Since this time the Council have undertaken further work on this area and this is also summarised in *Background Paper 1* (SD/015) and includes a further update to the Habitats Regulation Assessment (dated December 2014) (SD/022).
25. Notwithstanding this additional work that has been undertaken our client still has concerns regarding the robustness of the evidence used to justify the current approach to the

distribution of dwellings in the Core Strategy (in terms of specific reductions to certain settlements) and whether the correct procedural and legal requirements have still been addressed.

26. It is still noted that this detailed work is being undertaken ahead of any Allocations DPD being prepared and evidence and as detailed in our comments above, in the absence of an Allocations DPD (or even a draft of this document) it will prove difficult for the Council to grapple with issues such as accommodating required development within areas affected by the SPA/SAC.

27. We look forward to discussing this in more detail at the relevant hearing session.