

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 4E: HOUSING PROVISION*****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 4E, which covers Housing Provision, is contained in this statement. The key issue highlighted by the Inspector is:

“Is the Council’s approach to establishing housing site allocation principles consistent with the latest national guidance (NPPF/NPPG)?”

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

Policy HO7 – Housing Site Allocation Principles:

a) Is the approach to establishing housing site allocations, including various criteria, supported by evidence, and is it effective, clear and soundly-based?

7. As outlined in our comments in relation to Matter 7B, we believe the current position of the Council in ‘prioritising’ the use of brownfield land conflicts with the NPPF which instead in paragraph 17 ‘encourages’ the use of previously developed sites. Policy HO7 as currently worded would imply a sequential approach to development which would favour brownfield sites. This would render the policy, as drafted, unsound.
8. Policy HO7 continues in part E to advocate minimising the use of Green Belt land. This is in spite of the Council’s own evidence contained with the *Strategic Housing Land Availability Assessment* (“SHLAA”) (May 2013) (EB/049) which would indicate that Green Belt land needs to be released in order for the Council to meet its housing requirements over the plan period. In this respect we request that the policy should be amended so that it recognises the need to release Green Belt land to meet housing needs over the plan period. This would provide greater clarity.
9. Part F of Policy HO7 establishes a number of criteria which seek to maximise positive environmental benefits to development. This includes providing opportunities to draw energy from decentralised and renewable/low carbon sources. This however needs to be supported by

evidence; especially given viability concerns regarding the development of housing in a number of areas of Bradford and its district that are specifically outlined in the *Local Plan Viability Assessment* and its associated update (EB/045 and 046).

b) Does the policy properly consider the balance between homes and jobs, and between prioritising brownfield against greenfield land?

10. As outlined in our comments provided in relation to Matter 4A, our client does not believe the current housing requirement outlined in the Core Strategy meets the Council's Objectively Assessed Needs ("OAN") and does not currently provide a suitable balance between homes and jobs. The proposed housing requirements within the Core Strategy (2,200 dwellings per annum) would provide housing to support growth of 1,600 jobs per annum; this is significantly less than the 2,897 jobs per annum outlined in Policy EC2 of the Core Strategy. This imbalance will either result in the Council not fulfilling its economic potential, or result in an unsustainable increase in commuting into the district; both of which are inconsistent with the general aims of the NPPF.
11. Likewise our client does not believe a suitable balance has been struck between prioritising brownfield land against greenfield land. The current approach in Policy HO7 is to maximise the use of previously developed land through phasing policies. Our concern with this approach is highlighted in our response to Matter 7B and that there is little evidence or justification for this; indeed the policy as it stands at the moment will ultimately frustrate house building and further exacerbate the Council's inability to meet its housing targets or achieve and maintain a 5 year supply of deliverable sites by holding back sustainable and viable housing land.

c) Does the policy recognise Green Belt constraints and regeneration issues?

12. As outlined in our comments above, the policy takes an inconsistent approach to the Green Belt and does not acknowledge the substantial need for Green Belt release to address housing need over the plan period; rather it appears to take the opposite view of conserving Green Belt around the district.
13. Whilst the policy's thrust in prioritising regeneration areas is laudable, these are often in places of Bradford and its district which are the least viable to develop (as outlined in the Council's *Local Plan Viability Assessment* and its update (EB/045 and 046)). The policy therefore should not seek to delay bringing forward more viable areas earlier at the expense of

the regeneration areas; especially as the delivery of housing is of the up most importance to Bradford and its district.

d) Does the policy consider maximising environmental benefits and minimising environmental impact?

14. Whilst part F and G of the policy are broadly supported, it needs to be the case that any environmental measures should be considered more closely on a site by site basis and be subject to viability considerations. These criteria should therefore be indicative and guidelines only.