

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Keyland Developments Limited****(Representor ID: 444)*****Matter 4B: HOUSING SUPPLY*****Preamble**

1. Keyland Developments Limited ("our Client") is the property development business of Kelda Group and a sister company of Yorkshire Water. Our client has been operating across Yorkshire for over 20 years, redeveloping and regenerating surplus and redundant Yorkshire Water operational sites for a range of uses and in doing so, facilitating development across the region.
2. Our Client owns the areas of the Esholt Waste Treatment Works at the Esholt Estate (the Site) that are now redundant having been released from operational use following a substantial investment in the existing facilities.
3. The Site has the potential to deliver a significant and high quality employment led mixed use development that would make a significant contribution to Bradford's future development needs through the redevelopment of a brownfield site.
4. As a key stakeholder in the Bradford district our Client has a keen interest in the development of the Core Strategy which seeks to promote a suitable and flexible planning policy framework for the delivery of housing and jobs to meet the growth needs of the City.
5. This statement should be read alongside our previous written representations in relation to the emerging Core Strategy.
6. Our response to Matter 4B, which covers Housing Supply, is contained in this statement. The key issue highlighted by the Inspector is:

*“Is the approach to identifying the strategic sources of housing supply fully justified with up to date and reliable evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/NPPG)?”*

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

**Policy HO2 – Strategic Sources of Housing Supply**

**a) Is there sufficient evidence available to justify the main strategic sources of housing supply, including completions and commitments, former RUDP sites, including safeguarded land, new deliverable/developable sites, area-based initiatives including Growth Areas, including Urban Eco-Settlements in Shipley/Canal Road Corridor, Bradford City Centre, SE Bradford, Queensbury, Thornton, Silsden and Steeton with Eastburn, Holme Wood Urban Extension and local Green Belt releases?**

8. Our Client notes the main sources of housing supply contained within Policy HO2 and that this corresponds to Policies HO3 and HO6 of the Core Strategy. Whilst our Client can agree that some focus should be on housing completions and existing commitments, the Council will need demonstrate that remaining sites from the RUDP (including safeguarded sites) can still be realistically delivered. So far our client has not seen robust evidence that the remaining RUDP sites are still deliverable at present.
9. As outlined in our other statements some of the sources of supply outlined in Policy HO2 are in traditionally poorer market areas of the Bradford and its district (e.g. City Centre and South East Bradford). Our Client has concerns that these many of these sites will not be viable and the Council's own *Local Plan Viability Assessment* (EB/045) and its associated update (EB/046) notes that this is the case, especially when policy requirements of the Core Strategy are included (see paragraph 4.15.5 of the Local Plan Viability Assessment and 4.18.1 in the associated update).
10. Consequently there is concern from our Client that the focus on some of these strategic sources of supply will hamper the Council's ability to bring forward much needed housing development to meet its identified need and to address historic shortfalls in housing completions from previous years.

11. Instead the Council needs to revisit its housing policies (such as Policy HO2) to ensure they are flexible enough that the plan can ensure other areas of the district can accommodate any under-delivery from more viability compromised areas. This will help the Council achieve the requirement to 'boost significantly' the supply of housing outlined in paragraph 47 of the NPPF.
12. This is also the case with how this policy treats the release of Green Belt land. Whilst this part of the policy is generally supported by our client, there is likely to be a requirement for additional Green Belt release to ensure the Council can deliver the scale of housing required (if some strategic sources of supply are not viable) and as outlined in our response to Matter 4A, to accommodate an uplift to the Council's overall housing requirements which we consider is required.

**b) Is the policy founded on an up-to-date, accurate and comprehensive assessment of housing land availability, including SHLAA?**

13. Each of the strategic sources of housing supply outlined in Policy HO2 are found within the Council's most up to date *Strategic Housing Land Availability Assessment* ("SHLAA") published in May 2013 (EB/049); however it is clear from examining the sites provided in this document that they do not match the current distribution sought by the Council through its Core Strategy. For instance, it is envisaged that South East Bradford should provide 6,000 new homes over the plan period, yet the SHLAA only provides 5,318 dwellings (some of which may not even be deliverable), whilst it is envisaged that the Bradford City Centre is to provide 3,500 dwellings yet only 2,752 dwellings are found in the SHLAA.
14. As a result of this our Client does not believe the current approach for strategic sources of supply can be delivered in accordance with Policy HO2 even if it is viable, and if there is market demand to build this amount of dwellings in these locations anyway. Consequently it is clear that the strategy needs to be re-examined so as to allow delivery from other sources of supply to come forward.

**c) Is a better strategic framework needed for designated Growth Areas?**

15. The delivery of many of the Growth Areas sought in the Core Strategy is reliant on future allocating development plan documents being published and adopted. Whilst the Core Strategy can provide some degree of certainty over the future form of developments in these areas, meaningful development is likely to be delayed until these allocating documents are in

place. In addition to this and as outlined previously, there are genuine viability concerns in relation to the delivery of housing development in some of these areas.

16. In the meantime, there is a pressing need to provide more housing in Bradford and its district so as to meet its housing requirements and address historic under delivery of housing. In this respect a better framework is required for Growth Areas and it should be one that encourages their development but they should not receive priority over sites which can be developed sooner and which are better able to contribute towards Bradford's housing requirements in the shorter term.