

**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 4C: HOUSING REQUIREMENTS*****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 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?)"***

7. 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?**

8. 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.
9. 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.
10. 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 other areas such as North East Bradford where housing is proposed to be constrained at a level below the identified need based on population.
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 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 will not therefore 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 needed housing development in Bradford and its district. The Community Infrastructure Levy ("CIL") and continued use of S.106 monies can appropriately contribute towards necessary infrastructure.