

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 4E: HOUSING PROVISION*****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 and Promotional Document submitted in relation to the emerging Core Strategy.
6. 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)?”

7. We consider below the relevant 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?

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 2013 SHLAA which demonstrates 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).

a) 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. This points to the need to provide an upward adjustment to the current housing requirements for Bradford and its district.

11. Our Client supports the approach of maximising previously developed land, however the use of phasing policies to achieve this as proposed by Policy HO7 is not supported. 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.

a) 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 supported by our Client, 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.

a) 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.