
Dated: February 2015

**Bradford Local Plan
Core Strategy**

**Response to the Inspector's Schedule of
Matters, Issues and Questions
For Examination**

**Matter 4C: Housing Requirements
Policy HO3 – Distribution of the Housing Requirement**

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On behalf of

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CONTENTS

PAGE NO

1.0	Response to Matter 4C Policy HO3.....	1
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1. Response to Matter 4C

Policy HO3 – Distribution of the Housing Requirement

Key Issue: 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/PPG)?

Question 4.3a

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?

- 1.1 In relation to Steeton, we do not consider the Council has sufficient evidence to support the level of distribution proposed to the settlement of Steeton.
- 1.2 We support the identification of Steeton as a Local Growth Centre (LGC) in principle. However, the proposed distribution to Steeton is for only 700 houses when other Local Growth Centres have a higher distribution of 1000 houses. The Council in their supporting evidence has not demonstrated why a lower distribution is the most appropriate option for the settlement of Steeton.
- 1.3 It is maintained the low distribution to the Local Growth Centre of Steeton is not the most appropriate option. Compared to the nearby Local Growth Centre of Silsden where a higher distribution of 1,000 dwellings is proposed, it is maintained that Steeton is the more sustainable settlement.
- 1.4 The Council's own evidence set out in the Bradford Growth Assessment (November 2013) identifies that Silsden has no rail station and no high frequency bus service. In contrast, Steeton has a rail station and a high frequency bus service. Steeton is therefore a highly sustainable Local Growth Centre given the range of sustainable transport options available without the need for further infrastructure improvements and provides access to the Regional City and other nearby settlements.
- 1.5 The Growth Assessment identifies the quantum of land surrounding settlements that would be available unconstrained from development. In Steeton, there is 146.48 ha of unconstrained land, and a further 259.74 ha where there is a partial policy constraint of which 174.22 ha is unconstrained. Land supply is not therefore a constraint in this area.
- 1.6 In the Housing Background Paper (Part 1) the Council sets out information relating to the proposed distribution. This identifies that adjustments were made to the distribution to Addingham, Ilkley, Burley in Wharfedale, Menston and Silsden (eastern part) as a result of the imposition of South Pennine Moors Special Protection Area (SPA).
- 1.7 Barratt David Wilson Homes do not consider that the re-distribution of housing from the settlement in Addingham is justified, and this is addressed in the

statement prepared by Rural Solutions on their behalf. At paragraph 5.17 it is advised that reductions in housing targets in the settlements above have inevitably had to be 'paid for' via a modest redistribution to the Regional City. However, if re-distribution is necessary and justified, it should be settlements that are sustainable and where development is viable. In this regard, there are deliverability issues in Bradford and as such the Council should consider other sustainable settlements where development is viable, such as Steeton. No consideration appears to have been given to this option.

- 1.8 The Housing Background Paper (Part 1) provides tables setting out the changes in the proposed distribution along with a commentary. For most settlements a detailed commentary is provided with details of the settlements constraints. The commentary for Steeton is very short and no specific constraints are identified.
- 1.9 The settlement table in the Housing Background Paper also indicates that a distribution of 800 houses was proposed at the Further Engagement Draft Stage, compared to the 700 houses now proposed. No evidence or justification has been provided in the Paper which supports this reduction.
- 1.10 Given the settlement of Steeton is highly sustainable and arguably one of most sustainable of the Local Growth Centres, an appropriate amount of housing development should be distributed to Steeton in accordance with its role and function. It is maintained the proposed distribution is not supported by the evidence which demonstrates this to be a highly sustainable settlement.
- 1.11 The NPPF provides clear support for development in sustainable locations. The 11th Core Planning Principle set out in paragraph 17 states that planning should:-
- “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”*
- 1.12 Paragraph 30 of the NPPF also relates to development in sustainable locations, it states:-
- “Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”*
- 1.13 The NPPF provides clear support for development in sustainable locations where there are a range of sustainable transport options. As a highly sustainable settlement, the evidence does not support the distribution of a lower amount of housing development in Steeton, when other less well connected Local Growth Centres have a higher amount.
- 1.14 As set out in our representations to the Publication Draft, a distribution figure of 1,500 dwellings is proposed for Steeton, which also takes into account an alternative housing requirement figure. However, in the event the Inspector

supports the Council's housing requirement figure, at the very least the proposed distribution to Steeton should be in line with proposed distribution to Silsden given its sustainable nature, although a case could clearly be made for the distribution to be higher for Steeton.

- 1.15 On the basis of the case set out it is maintained the proposed distribution to Steeton is not justified. There is clear evidence that would support a higher distribution, particularly given the emphasis in the NPPF for development in sustainable locations and as such the proposed approach is deemed to be in conflict with national policy.

Question 4.3b

Does the policy pay sufficient regard to viability considerations?

- 1.16 DTZ, on behalf of the Council, have undertaken a Viability Assessment of the Core Strategy Publication Draft. However, this assessment only tests the viability of policies HO5, HO6, HO9, HO11, SC8 and EC4i. There has been no formal assessment of the viability of Policy HO3.
- 1.17 In relation to the viability of Policy HO3, a key consideration would be whether there is sufficient land to deliver the proposed distribution for each settlement. The Housing Background Paper (Part 1) is relevant in this regard as the settlement tables set out the proposed distribution in the context of the SHLAA capacity for that settlement. It is noted the distribution for Bradford City Centre is significantly higher than the identified SHLAA capacity, with a distribution proposed of 3,500 dwellings compared to the identified SHLAA capacity of just 2,752 dwellings.
- 1.18 In other settlements such as Keighley, concerns are raised in the commentary in relation to deliverability of sites and viability being marginal. Barratt David Wilson Homes are currently building out a 190 unit scheme in Keighley which was started 3 years ago and therefore they are directly aware of the market conditions in this area and support the Council's concerns regarding marginal viability in this area. Despite acknowledging such concerns, this does not appear to have influenced the proposed distribution to Keighley. The available evidence does not therefore suggest the Council has given full consideration to deliverability and viability in each settlement and its impact on the delivery of the objectively assessed housing need.
- 1.19 In many cases, the identified SHLAA capacity is not materially higher than the proposed distribution for a settlement. This provides the Council with little flexibility in the event there are deliverability / viability issues within a settlement and therefore it is considered the Council has not paid sufficient regard to viability considerations and their potential impact on the delivery of the proposed distribution. For the plan to be effective, the Council should have sufficient evidence the proposed distribution is deliverable.

Question 4.3c**Does the policy pay sufficient regard to the infrastructure requirements (especially highways and transport modelling)?**

- 1.20 The Housing Background Paper (Part 1) at paragraph 5.19 refers to the consideration given to transport and infrastructure with reference being made to paragraphs 5.3.46 to 5.3.48 of the Core Strategy. It is advised there are significant challenges apparent in both upgrading infrastructure and in developing transport corridor based initiatives to improve the efficiency of the transport network. The Council maintain there are no major infrastructure issues which cannot be resolved given careful planning and adequate resources.
- 1.21 To address transport and infrastructure issues this will therefore take time and money and will therefore potentially impact on the timing of delivery for some housing sites. In relation to Steeton, this again gives additional weight to directing a higher level of distribution to this settlement as the necessary infrastructure in terms of public transport (bus and rail) are already in place and the Council has not identified any further infrastructure constraints in this settlement.

Question 4.3d**Does the policy pay sufficient regard to constraint policies (especially in Airedale and Wharfedale)**

- 1.22 In our representations to the Publication Draft it was maintained the proposed distribution was unsound as the proposed approach could not be justified given evidence relating to land constraints in some settlements in the first two tiers of the settlement hierarchy and the ability of settlements in the Wharfedale area to accommodate a higher level of growth than is proposed.
- 1.23 Having reviewed the Housing Background Paper with specific regard to the settlements within Airedale, the Council identify that the distribution to Bingley, Silsden (eastern part), Baildon and East Morton are affected by the SPA buffer. Although not specifically a policy constraint, the Council also highlight viability concerns in relation to Keighley, although it is a requirement of the NPPF for plans to be deliverable and for careful attention to be paid to viability (paragraph 173). For the settlement of Cottingley, there are sustainability concerns identified along with surrounding land being deemed to be key Green Belt land with concerns regarding coalescence. Steeton is the only settlement in Airedale where no specific policy constraints are identified in the commentary in the settlement tables.
- 1.24 In the Bradford Growth Assessment the Council identifies constraints to growth around each settlement. Whilst the Council's evidence base clearly contains information with regard to constraints, it is questioned how this evidence has been utilised. Some of these constraints are policy constraints, whilst others are physical constraints, which have potential to be addressed through appropriate design solutions. It is not clear how this detailed evidence has influenced the resultant distribution.

Question 4.3e

Are the various proportions / amounts of housing development proposed for each of the towns and settlements fully justified with evidence?

- 1.25 As set out in our response to question 4.3a, it is maintained the proposed distribution to the proposed Local Growth Centre of Steeton is not fully justified by the Council's evidence. The evidence would more clearly suggest that as a highly sustainable settlement with large areas of unconstrained land (evidenced in the Growth Assessment) and where public transport infrastructure is already in place, that it would be an appropriate location to accommodate higher levels of growth than is proposed in the Publication Draft.
- 1.26 As previously outlined, the Council are proposing to distribute 700 dwelling to Steeton, despite this settlement having no train station and high frequency bus services, when 1000 dwellings are proposed to be distribution to the Local Growth Centre of Silsden, when it either a high frequency bus service or a train station within its settlement boundary. Whilst it is acknowledged that Silsden is proximate to Steeton and the Council's infrastructure plan seeks to improve links between Silsden and Steeton in order that residents can more readily access the public transport options in Steeton, there is no clear justification as to why a lower distribution is proposed for Steeton given its highly sustainable nature.
- 1.27 Based on the amended housing requirement figure set out in our representations to the Publication Draft a figure of 1,500 dwellings is suggested, although even if the Council's housing requirement was found to be sound, at the very least, it is maintained the distribution proposed for Steeton should at least be at the level proposed for Silsden.
- 1.28 The Council has not set out why Steeton has a lower distribution than the nearby Growth Centre of Silsden, or why the distribution was reduced from 800 in the Further Engagement Draft to 700 in the Publication Draft. Based on the Council's own evidence base, the proposed housing distribution to Steeton is not justified and a higher figure would be the most appropriate option in this regard.