

BRADFORD LOCAL PLAN CORE STRATEGY**EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Chartford Homes
(Representor ID: 437)*****Matter 4C: HOUSING REQUIREMENTS*****Preamble**

1. On behalf of Our Client Chartford Homes, 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 has made previous representations to the plan, with specific regard to their land at Addingham and will be represented at the hearing sessions.
5. 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?)"

6. 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?**

7. The approach in Policy HO3 is to provide a broad indication of the distribution of dwellings within Bradford and its district with the site specific details provided through detailed site allocations in a subsequent development plan document.
8. In establishing the distribution of the overall level of homes to individual settlements, 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).
9. The effect of this is outlined in tables HO3 - HO7 of the CSDPD where overall there is a noticeable boost in housing numbers in areas such as Bradford City Centre, Shipley and Canal Road Corridor, South East Bradford and Keighley. This appears to be at the expense of settlements such as Addingham, areas of Bradford outside of the south east and many of the Local Service Centres where housing is proposed to be constrained to a level below the identified need based on population.
10. This is largely based on the results of the Council's *Habitat Regulations Assessment* work (SD/019-022) and its *Growth Assessment* (EB/047). We have concerns about this approach and outlined these in our responses to questions B and D below.
11. In terms of the Habitats Assessment, this has resulted in Policy SC8, which provides guidance for the allocation of homes and determination of planning applications within defined Zones. In this respect Addingham is included in Zone Bi, whereby the underlying principle is to establish that sufficient foraging resources continue to be available for protected species.
12. In this respect the Core Strategy has reduced the level of homes in Addingham to 200. However, no evidence is provided to demonstrate that anymore than 200 homes will prejudice the principles established in Policy SC8. The Further Consultation Draft was based on an assessment of need without the constraint of the HRA being applied, resulting in a need for 400 new homes. Given that this has reduced, evidence should be provided to demonstrate the

harm to protected species that would occur from providing the actual need attributed to Addingham.

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 certain previously developed sites will not be able to 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 constraint policies (especially in Airedale and Wharfedale)?

20. One of the primary drivers for the distribution of dwellings outlined in the Core Strategy has been in relation to ecological considerations specifically those contained in the Habitats Regulation Assessment. This is with reference to the impact of Special Protection Areas ("SPA") and Special Areas of Conservation ("SAC"). It is considered that the imposition of restraint to growth based on this is an unsound approach and not supported by evidence.

21. Whilst our Client acknowledges that there is a requirement to ensure key areas of wildlife are given the necessary protection, a 2.5km buffer zone is considered overly cautious and in employing such a wide buffer has the effect of unnecessarily constraining growth within certain areas of Wharfedale and Airedale where there is a clear identified need for housing. Continuing with this approach will therefore create imbalances within the housing market and unsustainable patterns of development.
22. It is noted that the buffer incorporates all SHLAA sites within Addingham and if applied as an exclusion zone would remove all development opportunities. This is clearly not the purpose of the buffer zone, and as demonstrated by Policy SC8 does allow for new homes to a limit where harm would occur. The HRA is given significant weight in making a decision to reduce the number of homes in Addingham and to restrict any amendment to the Green Belt, however this does not provide any tangible evidence to support a 50% reduction from 400 to 200 homes within Addingham.
23. Our previous representations highlighted the flaws which had been identified in the preparation and application of the Appropriate Assessments which have been used to underpin Policy HO3 and as a result of these a lack of reasonable alternatives to the current approach had not been duly considered and that the policy was unduly restrictive in nature and went further than necessary to secure the protection of the relevant European sites.
24. Since this time the Council have undertaken further work on this area and this is also summarised in *Background Paper 1* (SD/015) and includes a further update to the Habitats Regulation Assessment (dated December 2014) (SD/022).
25. Notwithstanding this additional work that has been undertaken our client still has concerns regarding the robustness of the evidence used to justify the current approach to the distribution of dwellings in the Core Strategy (in terms of specific reductions to certain settlements) and whether the correct procedural and legal requirements have still been addressed.