

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 4E: HOUSING PROVISION*****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. Our Client makes representations with specific reference to their landholding in Addingham. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
2. 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)?"

3. We consider below the 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?

4. As outlined in our comments in relation to Matter 7B, we believe the current position of the Council in 'prioritising' the use of brownfield land conflicts with the NPPF which instead in paragraph 17 'encourages' the use of previously developed sites. Policy HO7 as currently

worded would imply a sequential approach to development which would favour brownfield sites. This would render the policy, as drafted, unsound.

5. 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 *Strategic Housing Land Availability Assessment* ("SHLAA") (May 2013) (EB/049) which would indicate 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.
6. 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).

b) Does the policy properly consider the balance between homes and jobs, and between prioritising brownfield against greenfield land?

7. As stated in other representations, each settlement has its own individual needs which need to be met. Some of these settlements, such as Addingham do not have previously developed sites and as such require new homes to be delivered on Greenfield sites. Should a holistic view across the district be taken to prioritise and phase previously developed land first, this will stifle the growth and ability to deliver homes that are needed in certain locations.
8. In order to properly consider a balance this needs to be recognised and any prioritisation of previously developed land should not be done at the expense of settlements, which cannot deliver this objective. The approach as set out at the moment will lead to settlements in need of new homes failing to deliver any until later in the plan period at the expenses of the needs that currently exist.

c) Does the policy recognise Green Belt constraints and regeneration issues?

9. The Policy recognises that land in the Green Belt will need to be released to deliver the necessary new homes in the district, however the policy seeks to minimise the amount of

Green Belt land that it utilised. The exceptional circumstances to release land from the Green Belt, amongst others, is the need to deliver homes. The level of homes required is outlined in the plan and sites chosen for their release have to be deliverable. The Green Belt land required is to meet the needs of the district and should not be constrained. Similarly non deliverable non Green belt sites should not be allocated in order to 'minimise' the amount of Green belt land used.