

**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 6C: SUB AREA POLICIES (WHARFEDALE)*****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 response to Matter 6C, which covers the sub area policies relating to Wharfedale, is contained in this statement. The responses are with reference the Inspector's headings and questions below:

***Policies WD1 and WD2 – WHARFEDALE*****Strategic Pattern of Development****a) Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?**

6. The current approach by the Council through Policy WD1 of the Core Strategy is to restrict the growth of some of the settlements in Wharfedale in comparison with the requirements based purely on demographic changes through the plan period. This includes the Addingham, where there is a reduction of 50% from 400 new homes to 200.
7. The primary reasons for undertaking this approach are as a result of an overall reduction of the housing requirement of Wharfedale to concentrate housing development in areas requiring

regeneration (Bradford and Shipley/Canal Corridor) and to take into account the impact of the SPA/SAC on Wharfedale and accommodating the necessary buffer zone (2.5km). Having considered the level of homes proposed in each settlement it is noted that the reduction of homes in Wharfedale from those proposed in the Further Consultation draft is disproportionate to elsewhere in the district. Whilst the average reduction in homes is approximately 25%, the settlements in Wharfedale have reductions of between 50-60%.

8. In terms of the first reason stated; whilst our client agrees that there are areas of Bradford and its district that need regenerating, sites have to be deliverable. The area around Wharfedale presents some of the highest value market areas in Bradford and so the area's towns and villages are the most able to viably deliver the housing that the Council requires. This is clearly shown in the Council's *Local Plan Viability Assessment* and its associated update (EB/045 and 046) which shows this area as one of the few in the district that can deliver housing in today's market conditions (see Figure 4.2 of the Local Plan Viability Assessment).
9. In contrast to this, many of the areas where housing has now been skewed towards (such as Bradford City Centre and South East Bradford) appear to be unviable in the current market conditions. This evidence points to the fact that the current distribution is not deliverable and that flexibility should be put in place to allow additional development in Wharfedale in the event sites elsewhere in the district are not viable.
10. The Council also refer to the HRA requiring a reduction in the level of homes proposed in Addingham, as the levels proposed would result in harm. This approach is not supported by evidence and consistent with Policy SC8. Policy SC8 confirms that development can occur, providing that sufficient foraging resources remain available. No evidence exists to demonstrate that the figures proposed in Policy WD1 are the threshold where any further development would result in a shortage of foraging land.
11. When considering the evidence it is our client's view that a balance clearly needs to be struck between environmental considerations, viability considerations and the need to deliver housing. In relation to Wharfedale and Policy WD1 it is our client's considered opinion that this balance has not been met and that the Council are unnecessarily restricting development in Wharfedale to the detriment of the district as a whole.

**b) Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

12. The NPPF in paragraph 47 is clear that it is the local planning authority's role is to 'boost significantly' the supply of housing. Our client is not convinced that the current distribution as proposed through the Core Strategy as a whole can be achieved in a viable and sustainable manner. In respect of the specific approach to Wharfedale outlined in Policy WD1, this covers the most viable areas within Bradford's district to bring forward residential development and so has the potential to make a meaningful contribution to the Council's housing requirements over the plan period and to assist the Council in 'boosting significantly' housing building in Bradford and its district.
13. The current approach in WD1 however takes the approach of restricting housing building in Wharfedale to generally below levels of population change in this area for reasons of ecology (through the SPA/SAC buffer zone).
14. It is our client's considered opinion that the current strategy for housing distribution is not supported by robust evidence and that many of the areas that the Council has decided to prioritise (Bradford City Centre and South East Bradford for instance) over and above Wharfedale have serious viability issues (see the *Local Plan Viability Assessment* and its update EB/045 and 046). This coupled with a policy which unnecessarily prioritises previously developed land (Policy HO6) and another which phases development so that deliver of housing is restricted in earlier years of the plan period (Policy HO4) means that the Council's ability to 'boost significantly' house building is severely compromised and will inevitably lead to an unbalanced and unsustainable housing market.

### **New Development Locations**

**b) Is there sufficient justification and evidence to support the specific proposals for development at Addingham, including urban redevelopment and the need to release Green Belt land and the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance of housing and employment land, impact on heritage assets and local communities, and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

15. The specific proposals for Addingham no longer include the need for a Green Belt review to meet the local housing needs. Further to this Policy WD2 identifies the locations within the sub-area where a Green Belt review should take place, discounting Addingham. Whilst this is

not the appropriate stage to promote sites the available and deliverable sites must be considered to ensure that the Councils proposal to retain the existing Green Belt boundary will enable the delivery of new homes.

16. The SHLAA forms part of the evidence base for the CSDPD and as such can be seen to justify the Councils position regarding Addingham to demonstrate that 200 homes can be delivered without a Green Belt release.
17. Only six sites exist within the SHLAA in Addingham not affected by the Green Belt. If all of these sites came forward and were developed to their maximum capacity, this would only deliver 255 homes over the plan period. Whilst this is above the 200 homes target it should be noted as a figure based on a delivery of 30dph on the gross areas of the sites. Two of the sites have approximately 25% located within Flood Zone 3 (006 and 016) and others include significant tree coverage protected by TPO (011). Site 011 is also identified as a current housing allocation, which has not been delivered. Further inclusion would be questionable as there are clear deliverability issues.
18. More importantly however is an acknowledgement within the SHLAA assessment that in order to deliver sites 002 and 003, which jointly provide 88 homes, development would need to be carried out in accordance with the development of adjacent land, itself within the Green Belt. This is categorical evidence that without a Green Belt release the SHLAA only identifies sites capable of delivering 167 homes, should Policy WD1 as drafted be adopted. In addition to this is the clear question marks over a number of other sites within the SHLAA regarding their deliverability.
19. Whilst these statements are not intended to support or dismiss the merits of individual sites it clearly shows that the policy as drafted (even with the debated reduced figure) is not deliverable and a Green Belt review should not be categorically dismissed as this would, on the Councils own evidence, result in an undeliverable plan.
20. Policies WD1 and WD2 should therefore be amended as with Green Belt policies to reflect the need for a full review of Green Belt boundaries to include Addingham and to ensure that the necessary level of new homes can be delivered.