

Additional Representations regarding the Examination of the Bradford Local Plan Core Strategy

MATTER 1 - LEGAL & PROCEDURAL REQUIREMENTS including Duty to Co-operate

Bradford Council have acknowledged their historic and current undersupply of housing (for example in determining recent applications such as application ref. 14/00208/MAO.).

This undersupply needs to be considered in the context of undersupply in adjoining authorities for example Leeds, Kirklees, Harrogate, Pendle and Craven.

We believe the Council have not co-operated with adjoining authorities to address this issue in a way that fully complies with their Duty to Co-operate.

MATTER 2 - SPATIAL VISION & OBJECTIVES

Planning Policy Statement 12 sets out the required approach to the spatial distribution Bradford should take.

Bradford's approach is sensible in principle but it is important to emphasise the importance of flexibility within their plan. In Bradfords case, there needs to be an ability to differentiate between its housing market areas.

Bradford is geographically very varied in market terms. For example residential values range from some of Yorkshires highest values areas like Ilkley, to some of the lowest value areas such as Inner City Bradford, Tong, Canal Road and Buttershaw.

The commercial position with regards to Bradford housing market areas is that it has some very strong areas and some very weak ones.

Viability and deliverability of sites identified to meet its housing needs is therefore all important. Also site-specific abnormal development costs and general infrastructure issues will also have a bearing on deliverability, particularly in lower value areas.

MATTER 3 - STRATEGIC CORE POLICIES including Policy SC1 – Overall Approach

Comments as above.

MATTER 3 - STRATEGIC CORE POLICIES (CONT) Policy SC4 – Settlement Hierarchy

The broad thrust of the proposed Settlement Hierarchy is supported subject to the above comments about the impact of market areas and viability on

<p>deliverability.</p>
<p>MATTER 3 - STRATEGIC CORE POLICIES (CONT) Policy SC5 – Location of Development</p> <p>The broad thrust of the location of development is supported subject to the above comments about the impact of market areas and viability on deliverability. This means that the location of substantial numbers of housing units in, for example, Canal Road and Holme Wood Urban Extension must be realistic in terms of deliverability and the timescales of their ability to contribute to housing supply.</p>
<p>MATTER 3 – STRATEGIC CORE POLICIES (CONT) - Policy SC7 – Green Belt</p> <p>Our comments with regard to Green Belt are the same as the those made under other matters, where mention is made of the Green Belt.</p> <p>The Council recognises the ability of Green Belt land to be considered to meet its housing need, it is important that this is carried through into practice should it not be able to meet its 5 year requirement (as is currently the case), and in this respect the most appropriate and viable and deliverable sites that do not meet the function of Green Belt land should come forwards.</p>
<p>MATTER 4C - HOUSING DISTRIBUTION</p> <p>Policy HO3 – Distribution of the Housing Requirement</p> <p>Our comments are the same as those under Matter 3.</p>
<p>MATTER 6A - SUB-AREA POLICIES CITY OF BRADFORD INCLUDING SHIPLEY & LOWER BAILDON Policies BD1-BD2 including</p> <p>Bradford City Centre (M6a) ShIPLEY/Canal Road Corridor Peripheral communities Growth Areas, including</p> <ul style="list-style-type: none"> - South-East Bradford, including Holme Wood urban extension - North-East Bradford - North-West Bradford <p>. Our comment with regard to the North West Bradford urban area is that it has been recognised as a potentially suitable location for localised Green Belt release. In comparison to urban fringe locations to the south and north east of Bradford, the Core Strategy already considers that the North West urban area and rural settlements offer greater scope for localised Green Belt deletion and strategic allocation.</p> <p>- South-West Bradford</p>
<p>HOUSING including</p> <p>MATTER 7B - MANAGING HOUSING DELIVERY Policy HO6 – Previously Developed Land</p>

The councils proposed target of 50% of development being located on Brownfield sites seem, on the face of it, appropriate, but needs to be flexible and must not be at the expense of the Councils housing delivery. If Brownfield sites are located in weak market areas the Councils ability to deliver a 5 year (let alone a 15 year) housing supply would be compromised.

In such circumstances Open Green space, Greenfield and Greenbelt sites should be brought forwards. The Council's current housing supply position suggests the councils brownfield target is already failing to create a sufficient land to meet the five year supply target, and therefore there is immediate need to bring forwards well located, sustainable, viable and deliverable Green Belt sites that do not meet the function of Green Belt, in addition to Brownfield, unallocated and Open Green space land.

MATTER 4E – HOUSING PROVISION

Policy HO7 – Housing Site Allocations Principles

Comments like the one above, underline that sites such as NW033 Chellow Dene which are located in medium value market areas, yet sustainable and deliverable locations, are exactly the right sort of opportunity that is capable of being delivered at an early stage and assisting in meeting Bradford's housing need, particularly its 5 year supply target.

In this regard we propose that the Core Strategy needs to have some inbuilt flexibility to take into account achieve the councils housing numbers.

MATTER 7B - HOUSING

including

Policies HO8, HO9, HO10 and HO12:

Housing Mix and Quality;

Overcrowding and Empty Homes;

Sites for Travellers and Travelling Showpeople

With regards to the councils housing mix policy and the council should be wary of potential impact this may have on viability and again ability to provide a five-year housing supply.

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