Bradford Core Strategy Development Plan Document Examination

Matter 4C Statement

Prepared on behalf of Countryside Properties (UK) Ltd February 2015



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Matter 4C: Housing Requirements

Policy HO3: Distribution of Housing Development

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 Countryside Properties are in support of the strategic policies SC4 and SC5 which confirm the Settlement Hierarchy and the locations where development should be directed within the district. Countryside Properties are in support of the distribution figures included within Policy HO3 as they are reflective of the Settlement Hierarchy.
- 1.2 The evidence base used to support Policy HO3 is largely contained within the 2013 SHLAA and SHMA updates and these documents provide sufficient justification to support the requirement to deliver 1,000 dwellings in Silsden throughout the plan period. Silsden has been identified as a Local Growth Centre under Policy SC4 and so this minimum level of housing growth is appropriate in this context. The SHLAA has identified suitable sites with a potential capacity to deliver 1,592 dwellings and so there is a realistic possibility of the 1,000 dwellings target not just being met, but exceeded. This ensures that this element of the Plan is deliverable, in accordance with NPPF.
- 1.3 Countryside Properties are therefore supportive of the proposed distribution of a minimum 1,000 dwellings to be delivered in Silsden and there is sufficient robust evidence available to support the Council's position.

Does the policy pay sufficient regard to viability considerations?

1.4 Countryside Properties have no comment to make in relation to this question.

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

1.5 Countryside Properties have no comment to make in relation to this question.

Does the policy pay sufficient regard to constraints policies (especially in Airedale & Wharfdale)?

1.6 The supporting text to Policy HO3 clearly sets out the steps that have been taken with regards to all known physical constraints and these constraints have also been mapped. The

results of this exercise have directly influenced the quantum of housing considered to be capable of being delivered in each settlement within the Growth Assessment. Countryside are therefore of the view that sufficient regard has been given to constraints policies when formulating Policy HO3.

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

- 1.7 Countryside consider the distribution of 1,000 dwellings to Silsden to be an appropriate level and are firmly of the view that this minimum level of growth should be maintained. More detailed comments relating to the level of growth distributed to Silsden can be found in Countryside's Matter 6B Statement.
- 1.8 An important consideration when establishing appropriate levels of growth is the need to meet identified affordable housing needs. At present, there is a net shortfall of 749 affordable dwellings per annum across the district. Specifically, Wharfdale has been identified to deliver 30-40% of all affordable dwellings, which is a reflection of the additional need that exists in this area as a result of the higher value housing.
- 1.9 Silsden is located in Airedale within the Wharfdale SHMA sub-area. Therefore there is a need to ensure that the housing distribution figure attached to Silsden (1,000 dwellings) is maintained to ensure that sufficient affordable housing is delivered in the wider Wharfdale region as part of the wider strategy to meet affordable housing needs.
- 1.10 The status of Silsden as a Local Growth Centre and the absence of alternative locations in Wharfdale to help meet this need underline the importance to not reduce this requirement any further.