



Bradford Local Plan Core Strategy Examination - Hearing Statement

Representations on behalf of CEG Land Promotions Ltd (CEG)

Representor Reference: 495
Date: February 2015

Matter 2: Spatial Vision

Key issue:

Is the Spatial Vision for Bradford justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the Plan, and are the Strategic Objectives appropriate, effective, justified and soundly based, and will they help to deliver the spatial vision of the Plan?

Question 2.1: Spatial Vision:

a) Does the Vision set out an appropriate, justified, effective and locally distinctive Spatial Vision for the future development of Bradford over the plan period in a clear and positive manner, providing a sound basis for the strategic policies in the Plan and giving sufficient strategic direction for the area to 2030, with an appropriate balance between economic growth, sustainable development, infrastructure requirements, environmental and social matters, and between brownfield and greenfield sites;

1.1 CEG support the statement that by 2030 “the growth of ... Wharfedale has been supported by a significant increase in delivery of new houses, both market and affordable.” However, as demonstrated in our responses to Matters 3, 4, 6 and 7 the opportunity for the identification of sustainable, deliverable and viable sites in Wharfedale has not been properly followed through and the promotion of sustainable development has been thwarted. Amongst other things, the downgrading of Burley-in-Wharfedale from a Growth Area and the restriction of housing numbers in this location is contrary to the vision set out and unsound.

b) Should the plan period be extended beyond 2030?

1.2 The NPPF, paragraph 157, states that “Crucially, Local Plans should... be drawn up over an appropriate time scale, preferably a 15-year time horizon.”. In this case the Core Strategy will have a 15 year timeframe - assuming it can be adopted this year – however, the Core Strategy is only one element of Bradford’s Local Plan. Crucially the DPDs that will allocate the land that will

enable the delivery of key components of the Core Strategy, and as a result the Local Plan, will not be adopted for at least another 2 years (as set out in the LDS (SS054)). CEG consider that the Local Plan with all its constituent parts will not be adopted within a timescale that ensures that it has a 15 year time horizon and so the Core Strategy should be extended beyond 2030 to enable the Local Plan in its entirety to comply with the NPPF, provided that the Core Strategy is made legally compliant and sound by the changes CEG has identified.

- 1.3 We have considered the LDS (SS054) in terms of time horizons. There appears to have already been some slippage in the anticipated timescales for the production of the Local Plan documents. Indeed the Core Strategy is already two months behind programme. The Council's website states that "*The City of Bradford MDC - Local Development Framework Group is to commence work on the Land Allocations DPD in due course*". This indicates that the production of this document is significantly behind what is anticipated in the LDS. That document stated that Issues and Options would have been consulted on in December 2014 which has not occurred, with adoption in November 2017. In light of this slippage, it is difficult to see how the Allocations DPD could be adopted before 2018. It is therefore considered that there is a strong case to extend the plan period beyond 2030.

Question 2.2: Strategic Objectives:

a) Does the Plan identify all the relevant Strategic Objectives, including those which have cross-boundary implications, and should any of the strategic priorities be amended to reflect the concerns of consultees?

- 1.4 CEG refers back to the comments it has made under the Duty to Cooperate under Matter 1. If the Plan were to proceed without alteration in its current form, then it is clear that the cross-boundary implications of the flawed assumptions in the HRA have not been addressed. However if a legally correct and sound approach is adopted to the HRA issues in the way CEG has suggested, these issues do not arise.