



# Bradford Local Plan Core Strategy Examination - Hearing Statement

## Representations on behalf of CEG Land Promotions Ltd (CEG)

---

Representor Reference: 495  
Date: February 2015

### **Matter 3.3: Strategic Core Policy SC5**

#### ***Question 3.3: Policy SC5 – Location of Development***

##### ***a) What is the justification for setting the priorities and criteria for locating new development; is it supported by evidence, appropriate and soundly based?***

- 1.1 There is no evidence to justify the sequential approach to the prioritisation in this policy. In particular the shortfall in deliverable sites currently available for housing in the plan area, the acknowledged absence of a five year housing land supply and the viability issues associated with the delivery of housing across much of the inner areas of Bradford and Keighley highlight that this policy is not supported by evidence. It is not supported by the findings of the SHLAA (EB049) or the Viability Assessment (EB046). Indeed it is contrary to the NPPF. These are issues that are also highlighted by CEG in respect of Matter 4
- 1.2 This policy is contrary to the NPPF. The NPPF does at paragraph 17 “encourage” but does not “prioritise” the re-use of previously developed land and paragraph 15 makes it clear that policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that development which is sustainable can be approved without delay. This means that sustainable locations should be promoted regardless of where they would sit in the Council’s hierarchy. Also, the NPPF is clear about the importance of identifying and maintaining a 5 year land supply for housing (paragraph 47) and the importance of deliverability and viability of land identified for housing. Paragraph 173 requires that plans are deliverable and that policy burdens should not impact on viability.
- 1.3 This policy should not “prioritise” previously developed land and should recognise the limited viability and deliverability of sites in the locations identified as “prioritised”. Applying this sequential test places too much burden for the delivery of housing in areas that have identified viability issues calling into question the deliverability of the Plan as a whole.

- 1.4 This said, acknowledgement that green belt releases are required to meet housing needs is welcomed. However, modifications are required to the policy to properly recognise the significant contribution green belt land releases will need to make to the housing supply for the plan as well as the number of sites that will need to be delivering in the second half of the plan period to ensure that housing targets are reached.

***b) Does the policy make the appropriate balance between prioritisation of brownfield land, use of brownfield land and windfalls, and greenfield land, and safeguarded land?***

- 1.5 The policy identifies the first priority for housing land allocations as “the re-use of deliverable and developable previously developed land and buildings provided that it is not of high environmental value” But, the evidence that supports the Plan, most notably the 2013 SHLAA (EB049) and the Viability Assessment Update (EB46) suggest that the opportunities to identify such land will be limited.
- 1.6 This policy should be modified to place greater weight on viability and deliverability given the housing trajectory presented at Appendix 6 of the CSPD. This demonstrates the requirement for accelerated growth in the later years of the plan (after the adoption of the DPDs that will actually make allocations) when a significant deficit will need to be made up from past under delivery.
- 1.7 CEG consider that undue reliance is placed upon brownfield land within inner urban areas to provide the much needed supply of additional land for housing. Much of these areas are identified by the Council’s Viability Assessment Update (EB046) as being unviable even without any policy contributions (including affordable housing) and so it is unclear how additional sites in these locations will be made deliverable within the plan period.
- 1.8 As stated above it is clear from the NPPF that the presumption in favour of sustainable development should override any locational priorities such as are presented in this policy. This presumption should apply equally to windfall sites.
- 1.9 This policy as written will exacerbate existing viability issues and will perpetuate the current undersupply of housing against current and future housing requirements. There is no evidence that demonstrates that the required number of homes can be delivered within the parameters of this policy. This policy is therefore unsound as it cannot be fully justified.

***c) How will sites be assessed and are the accessibility standards inflexible?***

- 1.10 CEG has no further comment to make.