



Bradford Local Plan Core Strategy Examination - Hearing Statement

Representations on behalf of CEG Land Promotions Ltd (CEG)

Representor Reference: 495
Date: February 2015

Matter 4C: Housing Requirements

Key issue:

Is the approach to the distribution of housing development to the various towns and settlements in Bradford fully justified with evidence, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

Question 4.3: Policy HO3 – Distribution of Housing Development

a) 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 The proposed distribution of the housing requirement and, in particular, the revisions to the distribution from that set by the earlier Further Engagement Draft is not justified by evidence, is not effective and has not been positively prepared. Importantly, the proposed distribution will not be effective in ensuring that the full objectively assessed needs for housing are met across the District.
- 1.2 In assessing the distribution, it is firstly helpful to compare how this has changed as part of the evolution of the plan. Table 1 below compares the settlement tier distribution of the Council's identified housing requirement at both the CSFED and CSPD stages of the plan.

Table 1 – Bradford Housing Requirement Distribution

Settlement	Further Engagement Draft		Publication Draft	
	Number	Percentage	Number	Percentage
Regional City of Bradford	28,000	61.5%	28,650	68%
Principal Towns	7,900	17.4%	6,700	15.9%
Growth Centres	6,100	13.4%	3,400	8.1%
Local Service Centres	3,500	7.7%	3,350	8.0%
Total	45,500	100%	42,100	100%

- 1.3 Whilst the figures in the publication draft have changed as a result of the overall housing requirement, the focus of distribution in proportional terms has shifted markedly to the Regional City, at the expense of the Principal Towns and Growth Centres. The revised proportion identified for other Local Service Centres is also artificially increased in the revised figures due to the demotion of both Burley-in-Wharfedale and Menston as Local Growth Centres.
- 1.4 Burley has seen the greatest proportional reduction in its housing number of all settlements across the District, having been reduced by 60% from 500 units to 200 units. By way of comparison, when the housing requirement is apportioned against a population baseline, the figure for Burley would amount to in excess of 500 units.
- 1.5 Apportioning the requirement purely in this way is somewhat of a crude exercise, ignoring the wider planning and sustainability considerations (considered later); but it does provide a useful baseline position in the case of Burley as to why the earlier CSFED apportionment was a baseline minimum figure.
- 1.6 The Council's position in revising the proposed distribution (both in numeric and proportional terms) is explained at paragraphs 9.8 and 9.9 of Background Paper 1: Overview (SD/015). Paragraph 9.8 refers to the lower figures apportioned to certain settlements as being partly as a result of the small reduction in the objectively assessed need for housing and also the 2013 SHLAA identifying a greater quantum of land in the main urban area of Bradford. It is said this results in more distribution choices than at the time of the preparation of the CSFED and it is suggested that there has been less of a reliance on locations such as Burley and Menston (both previously identified as Growth Centres) to accommodate growth.
- 1.7 But paragraph 9.9 is however explicit and candid in stating that as far as Wharfedale is concerned, the potential direct and indirect impacts of the CSFED's housing proposals on the South Pennine Moors SPA and its 2.5km buffer zone was actually the "*main driver*" for the changes eventually incorporated within the CSPD.
- 1.8 As CEG's response to the December 2014 Habitats Regulations Assessment (Appendix 1 to Matter Statement 1) makes clear, there is in fact no justification whatsoever for the Core Strategy to constrain housing distribution to Wharfedale on the basis of the conclusions of the HRA in the way advocated by the Council. Moreover, even on the face of the policy and claimed explanation, the Council provide no justification that withstands any scrutiny for the revised distribution that has been proposed for the Wharfedale settlements. This approach is flawed. It results in a seriously distorted strategy that has sacrificed sustainability and proper consideration of alternative strategies on a mistaken understanding of the SPA and the HRA.

- 1.9 In addition to the absence of any justification emanating from the HRA, there are no other reasons to justify the presently proposed distribution, including the much reduced level of housing identified for the Burley and the wider Wharfedale settlements. Certainly the Council, in identifying that the perceived impact upon the SPA and the 2.5km buffer is the “main driver”¹ for such an approach, accept this point.
- 1.10 By contrast, the consideration of other key planning and sustainability factors demonstrate that there is strong justification to increase the distribution in these settlements, in the context of seeking to plan positively to meet the full housing needs of the District. Such factors are considered below.
- 1.11 **Land Supply** – Although the Council has stated that the lands identified in the 2013 SHLAA has provided them with greater distributional choice, allowing the Regional City to accommodate a higher proportion of the requirement, a detailed analysis of the figures contained in that document contradicts that assertion.
- 1.12 As Appendix 1 of CEG’s Statement to Matter 4C demonstrates, the presently proposed distribution of the full housing requirement across the District cannot be accommodated by the land supply identified in the 2013 SHLAA. This is particularly the case within the sub-sectors which make up the Regional City of Bradford, where specific shortfalls are identified as follows:

Table 2: Housing Land Supply Shortfall

Sub Area	Housing Requirement	2013 SHLAA Capacity (during plan period)	Difference
Bradford City Centre	3,500	2,752	-748
Canal Road	3,200	1,994	-1,206
Bradford South East	6,000	5,318	-682
Bradford North West	4,500	4,192	-308
TOTAL	17,200	14,256	-2,944

- 1.13 Were the distribution to remain unchanged, the overall deficit in land supply in these parts of the Regional City would amount to 2,944 dwellings. It is also important to recognise that such a deficit represents a best case scenario for the Council, given that it assumes that all sites identified in the SHLAA would deliver the number of units that it anticipates during the plan period. In the absence of any more detailed assessment of these sites as part of the progression of the Site Allocations DPD and Area Action Plans, there can be

¹ Paragraph 9.9 of Background Paper 1 – Overview (Updated) (SD015)

no guarantee that such sites will deliver the numbers of units expected, or in the timescales anticipated.

- 1.14 Whilst Paragraph 4.26 of the Council's Background Paper 2: Housing (Part 1) asserts that policy levers and other initiatives could be introduced to bring forward the delivery of housing on key SHLAA sites, increasing the delivery during the plan period, such a view is clearly unrealistic because it wholly ignores the market attraction, viability and infrastructure constraints. Any initiatives suggested by the Council, whilst potentially encouraging delivery, would do little to influence such market factors.
- 1.15 Conversely, Burley has an abundance of available and deliverable land supply. The SHLAA identifies a potential yield of well over 1,000 dwellings. As indicated within the Vision Document included at Appendix 4 to CEG's representations to the CSPD, CEG's site alone is capable of accommodating at least 500 units, as well as supporting the increased community facilities and infrastructure resulting from such a level of growth in a sustainable way. The deliverability of this site is discussed in further detail within CEG's submissions to Matter 6b (Wharfedale).
- 1.16 **Viability /Deliverability Factors** – Issues of viability appear to have been largely ignored by the Council in formulating a distribution of its housing requirement. Policy HO3 is not addressed by the Viability Assessment Update of the CSPD (EB/046). As discussed within CEG's statement in respect of Matter 4B, this assessment does, nonetheless, demonstrate that even before policy costs are applied, much of inner Bradford and Keighley are presently unviable for housing development without subsidy. This matter is exacerbated further when the costs associated with the development of previously developed land are factored in. Given the focus of the proposed distribution upon these areas, the delivery of the overall housing requirement will clearly be compromised, particularly in the early plan period.
- 1.17 The conclusions of the Council's own evidence are further compounded by the market analysis of central and southern Bradford, undertaken on behalf of CEG by Allsop. This is contained at Appendix 2 of the Hearing Statement into Matter 4B and indicates that there has been a paucity of residential development in the City Centre since 2008, principally on account of low values and rents, poor viability and, importantly, low demand. They conclude that this will unlikely change in the foreseeable future. The report further demonstrates that current house building activity and rates of sales in southern Bradford reflect unsustainable rates of sales of less than 1 dwelling per month, compared to a regional norm of at least 3.
- 1.18 **Market Signals** – The NPPF and the accompanying PPG make clear that market signals such as land prices and housing affordability, should be taken into account in plan-making. In the absence of such an assessment having been undertaken by the Council, CEG as part of a consortium of developers,

commissioned NLP to undertake such a review. This is included at Appendix 3 to their representations to the CSPD. This study concludes that the approach in Policy HO3 (and subsequently Policy WD1) will fail to meet local housing needs within Wharfedale, taking account of a number of key market signals. These include, amongst others high house prices and affordability ratios; low levels of historic delivery and; high levels of under occupancy. It also states that these issues can only be addressed through the provision of additional housing within this part of the district, thereby allowing local housing needs within Wharfedale to be adequately met.

- 1.19 Aligned to the issue of market signal is the need to deliver affordable housing. As CEG's statement in respect of Matter 4a demonstrates, this is an acute issue in the District, with a need of at least 769 dwellings per annum.
- 1.20 Given that the Council's Viability Assessment Update (Ref. EB/046) demonstrates that the delivery of affordable housing is largely unviable in many parts of the District in current market conditions. It is therefore imperative that in order to address this need, the supply of housing is increased in the most viable parts of the District, where the affordable housing requirements are highest (Policy HO11 sets a target of up to 30% for Wharfedale) and where there is greatest opportunity to deliver such housing, either on site, or elsewhere in the District by way of a commuted sum.
- 1.21 **Growth Study** – The Bradford Growth Study has been identified by the Council as forming an important factor in directing the distribution, particularly in respect of the level of growth identified for the south-east part of the District.
- 1.22 The weight to be applied to the conclusions of this document in influencing the housing distribution should be limited, on the basis of the reliance it places upon the 2.5km buffer zone around the South Pennine Moors SPA as a defined 'medium constraint'. As CEG's case in respect of Matter 1 and Matter 3 has demonstrated, there is no justification to identify this as an area of constraint in that way. Indeed, as our settlement analysis of Burley-in-Wharfedale has demonstrated (Appendix 1 of CEG's Statement on Matter 3.2) the removal of this buffer as a constraint upon growth indicates that in the case of Burley, the area of unconstrained land surrounding the settlement increase from 0.06 hectares to over 200 hectares.
- 1.23 **Infrastructure** – It is considered that insufficient regard has been given to the infrastructure requirements of the proposed housing distribution and in particular the likely financial implications upon viably delivering the housing in the way anticipated. Using the proposed Holme Wood Urban Extension as an example, there appears to be no evidence provided by the Council as to how the significant infrastructure required to facilitate this proposal can be delivered, particularly in the context of the wider viability issues associated with delivering housing in this part of the District.

- 1.24 Conversely, as demonstrated within our submissions to Matter 3 (Specifically Policy SC4) Burley in Wharfedale comprises a strategically located settlement with excellent public transport links and local service provision. To this end, the settlement is capable of supporting additional levels of housing growth, whilst the CEG proposals for their landholdings indicate how it could deliver further infrastructure to meet the requirements of an increased population. This is discussed in further detail within our submissions in respect of Matter 6C.
- 1.25 **Flood Risk** – Paragraph 100 of the Framework advises that Local Plans should avoid areas of highest flood risk and for local authorities to adopt a sequential approach to direct development to areas of lowest flood risk. However, as set out within paragraph 5.3.55 of the CSPD, the housing numbers currently proposed within Policy HO3 will necessitate the development of land in flood zone 2 and 3a in Bradford City Centre and the Shipley Canal Road Corridor. The main justification for this is the outcome of the revised Habitats Regulation Assessment, with paragraph 5.3.56 stating that *“with significant areas of the district effectively ruled out for accommodating significant additional development due to the impacts on the internationally important S Pennine Moors SAC / SPA, the only remaining alternative would be to allocate additional development to other parts of the regional city”*, and in this case to areas of high flood risk.
- 1.26 In light of our conclusions in respect of the HRA, to identify land for development within the flood zone, when there are other areas of unconstrained land available (such as in Burley) is therefore contrary to the advice contained in the Framework.

Revisions Required to Make Policy HO3 Sound

- 1.27 As has been demonstrated by this statement, the presently proposed distribution cannot be considered to be sound. It is not justified by evidence, or considered against reasonable alternatives; it will not be effective in ensuring that the full housing needs of the District can be delivered; it is not consistent with national policy and guidance; and it is not positively prepared in the approach that it has taken in constraining distribution to Wharfedale.
- 1.28 In order to be found sound, it is considered that there should be a shift in the distribution reliance away from the Regional City (where the land supply is constrained, is unviable and presently requires land within defined flood risk areas) and towards other sustainable and viable locations in the District, particularly those settlements in Wharfedale, for which there is no justification for a constrained level of distribution.
- 1.29 In the case of Burley-in-Wharfedale, it is considered that the distribution should be increased to at least 500-700 units, within the current plan period. This reflects the housing requirement advocated in our response to Matter 4a, the need to redistribute an element of the requirement away from the Regional City

(due to the supply, deliverability and viability factors highlighted above) and that as a sustainable location identified in the settlement hierarchy as a Local Growth Centre (as advocated by CEG's comments on Policy SC4).

- 1.30 The lower figure in this range represents the Council's own previous figure in the earlier Further Engagement Draft, whilst the higher figure would put it on an equal footing with the level of housing identified for other Local Growth Centres such as Silsden (700) and Steeton (700), although still not as high as Local Growth Centres such as Queensbury (1,000) and Thornton (1,000).
- 1.31 By increasing the figure in this way, it will provide greater certainty that the overall housing requirements of the District can be delivered and will assist in the delivery of affordable housing, given the challenges faced by other parts of the District.
- 1.32 By not applying an upper limit through the inclusion of the words 'at least' to the figure apportioned to Burley, this will provide further flexibility at the Site Allocations stage, to maximise the prospect of the full housing requirement being delivered, should it be concluded at this stage that the available sites in the settlement are capable of being accommodated in an appropriate way which would allow for them to make a greater contribution to the overall requirement of the District.
- 1.33 Were the plan period to be extended beyond 2030, it would naturally follow the figure identified for Burley should be increase on a proportional, basis to reflect the increased housing requirement over this longer period.

b) Does the policy pay sufficient regard to viability considerations?

- 1.34 This matter has been addressed above. The policy does not pay sufficient regard to viability considerations. The Council's own Viability Assessment Update (EB/023-025), demonstrates that housing development in much of inner Bradford and Keighley is not viable in the current market, whilst the further assessment undertaken for CEG by Allsop (Appendix 2 of CEG's statement on Matter 4B) demonstrates that this will continue to be the case in parts of the City, including the City Centre and South East Bradford for the foreseeable future.

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

- 1.35 CEG has no further comments beyond those already stated above.

d) Does the policy pay sufficient regard to constraint policies (especially in Airedale & Wharfedale)?

1.36 This matter is addressed above and has also been dealt with in detail in respect of Matters 1 and 3. There is no justification to constrain the housing distribution in Wharfedale. The settlements in this area need to play an increased role in delivering the overall housing requirement.

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

1.37 This matter has been addressed above.