



# Bradford Local Plan Core Strategy Examination - Hearing Statement

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

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Representor Reference: 495  
Date: February 2015

### **Matter 4E: Housing Provision**

#### ***Key issue:***

***Is the Council's approach to establishing housing site allocation principles consistent with national guidance (NPPF/PPG)?***

#### ***Question 4.4: Policy HO7 – Housing Site Allocation Principles:***

***a) Is the approach to establishing housing site allocations, including the various criteria, supported by evidence, and is it effective, clear and soundly-based?***

- 1.1 The policy (HO7A) only supports the allocation of land to meet the targets set in HO1 and HO3 not the objectively assessed needs at the time of the allocation. Furthermore, as this plan does not in itself allocate but rather defers to future AAPs and DPDs, it cannot be considered to be a sound approach.
- 1.2 HO4B looks to prioritise regeneration areas but many of these areas appear to be unviable and unable to deliver the level of housing required within the policy constraints of the Plan and so within the Plan period. Indeed looking at the location of the Council's priority development areas the majority of these are in the low value bands. The Council's own Viability report suggests that parts of the Regional city area are unviable and the rest is only viable if no policy costs or affordable housing costs are added. Of the 3 principle towns Keighley is highlighted in value band 5. This indicates it is unviable. Two of the Growth Areas are also unviable locations for housing if policy costs are added, including affordable housing. Given this it is unrealistic and contrary to the evidence base to conclude that the housing numbers attributed to these areas can be delivered. Therefore this policy is not supported by the evidence (EB046) as presented by the Council.
- 1.3 This policy will therefore not help achieve a step change in housing delivery and will also not provide delivery before the Allocations DPD is adopted and land is released from the green belt to both catch up the shortfall and enable the volume of house building required to deliver the amount of homes needed by 2030. Until then the current circumstances will prevail and the availability of viable and deliverable sites will continue to hold back housing development in

the plan area. This further confirms that the other changes that have been identified by CEG as necessary for the plan are required and it also indicates that in the absence of a Duty to Cooperate arrangement to deal with the housing needs of the area in the first few years of the plan, this plan must release land from the green belt to enable more development to happen in the first 5 years of the plan.. A modification should be made to this policy accordingly.

***b) Does the policy properly consider the balance between homes and jobs, and between prioritising brownfield against greenfield land?***

- 1.4 HO7C suggests prioritising development of previously developed land via phasing policies while maintaining a 5 year land supply.
- 1.5 The prioritising of brownfield land only serves to increase the uncertainty about the deliverability of the Plan given the findings of the Council's Viability Assessment (EB046). Moreover, the Council's approach as summarised at Appendix 6 demonstrates that the proposed strategy will never realises provision of a 5 year land supply. Indeed, it is only by 2030 that the strategy claims that the Council will have caught up their numbers and this, in itself, relies upon delivering 3,600 dwellings per annum in the later years of the plan (which is 1,500 more than was achieved in the best years of 2007-08). Additionally, before this is claimed to can happen, the shortfall in housing delivery peaks at nearly 12,000 homes, which is over 5 years behind where the Council should be in terms of delivery, or over 6 years if proper regard is had to past under delivery with the consequential appropriate identification of 120% of supply in the first 5 years. The plan strategy is therefore directly contrary to the NPPF in terms of housing delivery and it is unrealistic and unsound.
- 1.6 There is no justification for phasing (as discussed in our response to Matter 7B). This is contrary to the NPPF.
- 1.7 HO4E looks to minimise the release of green belt land to meet housing needs yet the evidence that supports the plan identifies that at least 25% of all housing will need to be delivered on land to be released from the Green Belt (although this is an underestimate anyway, as identified elsewhere in CEG's submissions).
- 1.8 The policy does not properly recognise the need for an early release of Green Belt land to enable future allocations to meet the housing needs of the Plan area over the plan period. This need is clearly established by the evidence base and the policy needs to reflect this fact.

***c) Does the policy recognise Green Belt constraints and regeneration issues?***

- 1.9 No. As set out above the policy needs to be modified to recognise the need to release significant amounts of land from the greenbelt to enable the delivery of the plan's identified housing needs. Also as discussed above, the policy needs to recognise the viability issues in many of the regeneration areas.
- 1.10 A further modification should be made to introduce the concept of viability and deliverability within 5 years for allocated sites, given the pressure the housing trajectory will be under in the latter half of the plan. Logic suggests that the most recent under delivery is due to a lack of sites that can be brought forward viably. It is critical for the soundness of the plan that enough viable and deliverable sites are identified to meet the identified need.

***d) Does the policy consider maximising environmental benefits and minimising environmental impact?***

- 1.11 Save as already set out in CEG's submissions on other issues (including the unsustainable approach to housing the Council is proposing and consequential impact on the environment such as unsustainable development would have) CEG has no additional comments to make at this stage.