



Bradford Local Plan Core Strategy Examination - Hearing Statement

Representations on behalf of CEG Land Promotions Ltd (CEG)

Representor Reference: 495
Date: February 2015

Matter 6A: Sub-Area Policies – Regional City of Bradford

Key issue:

Does the Plan set out a clear, effective and soundly based framework for the Sub-Areas of Bradford, Airedale, Wharfedale and the South Pennine Towns and Villages, which is appropriate for the area, effective, positively prepared, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

Question 6.1: Strategic Pattern of Development:

a) Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?

and

b) Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

- 1.1 The Regional City of Bradford is identified as accommodating a total of 28,650 dwellings during the plan period. This represents 68% of the overall requirement, compared to 61.5% in the previous CSFED.
- 1.2 This level of housing in the regional city, the increased apportionment from the previous CSFED and its distribution across the sub-sectors that make up the regional city has not been demonstrated by the Council as being deliverable and can therefore not be justified, or deemed to be effective in assisting in delivering the overall housing requirement. Certainly the proportional increase in the overall housing distribution from the previous draft of the plan has not been justified with any evidence which holds up to scrutiny.
- 1.3 Such an absence of justification is considered and addressed within CEG's statements made in respect of other matters (in particular Matters 1, 3, 4b and 4c).
- 1.4 In respect of the defined Regional City of Bradford, CEG's case (as set out in the above statements) can be summarised as follows:

- 1 The decision to increase the level of housing supply (both in numeric and proportional terms) to the Regional City of Bradford as a response to reduction in housing numbers in those areas (such as Wharfedale) affected by the 2.5km buffer zone around the South Pennine Moors SPA/SAC, as identified within the various iterations of the Appropriate Assessment of the Core Strategy and carried forward into Policy SC8 is based upon a legally flawed and unsound methodology. 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 areas such as Wharfedale in this way and to attempt to compensate through increased distribution to the Regional City.
- 2 The Council's Viability Assessment Update (EB/046) published as recently as December 2014 demonstrates that all forms of housing development in inner/central Bradford¹ are not viable in current market conditions. Should additional costs associated with the delivery of the wider housing policies of the Core Strategy be factored in, this would make further areas of the Regional City unviable.
- 3 Work undertaken on behalf of CEG by Allsop (See Appendix 2 of CEG's statement to Matter 4b) indicates that the market demand for housing in central and southern Bradford is unlikely to change in the near future (particularly in the City Centre). Where housing development has occurred in recent years, this has been characterised by very low sales rates, particularly compared to other parts of the district and the wider region. In summary, the market cannot support the proposed level of housing identified for the City Centre and southern areas of Bradford during the plan period.
- 4 Notwithstanding the clear evidence identified in points 2 and 3 above, even if development within central Bradford was viable and there was a market demand for the levels proposed there is insufficient available land. The most up to date information on land availability (the 2013 SHLAA) demonstrates that there are a number of sub-sectors of the regional city area where the anticipated housing yield during its 18 year trajectory to 2029 (broadly correlating with the plan period) will fall well short of the proposed level of distribution for that area. This is the case in the City Centre (-748 dwellings), Canal Road (-1,206), Bradford South East (-682) and Bradford North West (-308) sub-sectors. In short, the latest SHLAA, both in terms of land supply and yield, does not support the Council's proposed distribution.

¹ Value Area 5 as defined in the DTZ Viability Update – December 2014 (EB/046)

- 1.5 In conclusion, the level and distribution of housing identified for the Regional City of Bradford during the plan period is not supported by the available evidence. It will result in objectively assessed needs for housing across the district not being met. To ensure delivery of the overall housing requirement and for Policy BD1 deemed to be sound, there needs to be a reduction in the level of housing apportioned to this area. It must be re-distributed to other sustainable parts of the District, which do not suffer from the same viability, market demand and land supply issues.

Question 6.2: Urban Regeneration and Renewal Priorities:

a) Is there sufficient justification and evidence to support the specific proposals for development, including at Bradford City Centre and Shipley/Canal Road Corridor? Has the policy considered the regeneration, environmental, viability, use of brownfield land, impact on heritage assets and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

b) Is the proposed policy approach to peripheral communities, including the specific villages listed, justified, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

- 1.6 This matter has already been substantially addressed within CEG's statement on Matter 4b, which at Appendix 2 containing a report, prepared by Allsop LLP considering demand for market housing in central and southern Bradford.
- 1.7 In respect of both the City Centre and the Shipley and Canal Road Corridor, the information contained within in the 2013 SHLAA does not provide the justification to demonstrate that the level of development is capable of being delivered on the land that is available. This issue has been addressed in detail in CEG's statements in respect of Matters 4b and 4c and in response to Question 6.1 above.
- 1.8 In respect of the City Centre, whilst the draft Area Action Plan attempts to show how such a level of development could be physically accommodated this has been subject to limited scrutiny (having only reached Further Options stage) and it is clearly unrealistic and will not meet the identified needs. It places significant reliance on high density flatted developments, either through the conversion of existing buildings, or through new build. Moreover, as the Council's own Viability Assessment Update (EB/046) demonstrates, such forms of development are unviable in current market conditions. The Allsop LLP report for CEG (Appendix 2: Matter 4b) has investigated this. Their report demonstrates that as a result of the ongoing viability issues and an absence of demand, there has been a paucity of development within the City Centre since 2008, coupled with a collapse in prices of flats. As such, a substantial recovery would be required before development begins to be viable again. Significant public sector intervention would be required (through gifts of land and grant aid) to stimulate any form of residential development activity within Bradford

City Centre, even recognising the improved attractiveness that the completion of the Westfield Shopping Centre may bring.

- 1.9 Finally, in addition to the problems of viability and demand factors, a number of City Centre sites identified in the in the SHLAA and AAP as forming part of the supply are locations where planning permission has expired, or where the owners' intentions are unknown. Such examples (albeit not exhaustive) include Beehive Mills, Thornton Road (SHLAA Ref. CC/07 – 168 units) and Midland Mills, Cape Street (SHLAA Ref. CC/22 – 304 units). In both cases planning permission has now expired and they can therefore not be considered to be developable in accordance with footnote 12 to Paragraph 47 of the Framework. This further highlights the inability to demonstrate the deliverability of such a level of housing as identified for the City Centre during the plan period.
- 1.10 In conclusion, the proposed delivery of level of housing identified for the Bradford City Centre during the plan period is is unrealistic, undeliverable and not supported by the available evidence. It will result in objectively assessed needs for housing across the district not being met.

Question 6.3: Growth Areas:

a) South-East Bradford:

i) Is there sufficient justification and evidence to support the proposals for South-East Bradford, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

and

ii) Holme Wood Urban Extension: Is there sufficient justification and evidence to support the proposals for the Holme Wood Urban Extension, including the exceptional circumstances necessary to release Green Belt land, the impact on existing uses, historic/heritage assets, landscape and regeneration, the need for additional infrastructure, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

- 1.11 This matter has already been addressed within CEG's statement on Matter 4b.
- 1.12 In overall terms, the Bradford South East sector is a further example of where the Council are seeking to plan for a level of development, which is unrealistic, undeliverable and not supported by the available evidence. As highlighted above, the Bradford South East area is constrained in its land supply. It also faces significant challenges in respect of viability, market demand and very low rates of sales on sites which have come forward in recent years.
- 1.13 Whilst the CSPD (paragraph 5.3.61) has claimed that the level of housing distribution for this sub-sector of the district reflects the conclusions of the Growth Study (EB/037), the conclusions of this study are clearly flawed and the study should be afforded very little weight due to these flaws. The results of

this study have been artificially and unnecessarily skewed towards identifying areas away from the 2.5km buffer zone of South Pennine Moors SPA (such as south east Bradford). It has been demonstrated in the material referred to in CEG's statements in respect of Matter 1 and 3 (SC8) that there is no evidential basis for identifying such a buffer zone as an area of constraint in the way suggested. The methodology and conclusions of the growth study therefore must be revisited by the Council to make its strategy sound.

- 1.14 There is indisputable evidence of a need to release Green Belt land in sustainable locations across the District to deliver the objectively assessed need for housing during the plan period there (again see CEG's response on Matter 4b). However this does not amount to evidence to demonstrate that the Holme Wood proposals are viable or that they deliver the number of houses anticipated during the plan period.
- 1.15 The Core Strategy does not identify an expected yield for the Holme Wood Urban Extension. However, it is noted that the Holme Wood and Tong (informal) Neighbourhood Development Plan, approved by the Council in January 2012 identifies a yield of 2,100 dwellings being delivered in this area, by way of an urban extension, in addition to a further 600 units in this area as infill to the existing estate.
- 1.16 Quite apart from Allsop's expert assessment on the market attraction and delivery of development in this part of the District, if it were to be brought forward for development, it would clearly not deliver anywhere near the 2,100 units anticipated in the plan period. The 2013 SHLAA does not anticipate it delivering housing until 2021 at the earliest. This is consistent with the irrefutable evidence of very low delivery rates being achieved in this part of the District. But even if the Council's more optimistic yield of 40 dwellings per annum on the very largest housing sites in the District² to be adopted, Holme Wood could still only deliver less than a quarter of the of the anticipated overall supply from this site during the plan period.
- 1.17 Paragraph 4.26 of Background Paper 2: Housing (Part 1)(SD/016) suggests that delivery from such sites could be released earlier in the plan period to help facilitate early delivery. This does not address the market attraction evidence. But in any event such earlier release could only be delivered through the Site Allocations DPD and work has not yet commenced on the preparation of that document and is unlikely to be adopted before 2018. There is very limited opportunity to increase earlier delivery from this site, once lead in times are also factored in.
- 1.18 In conclusion, the delivery of level of housing identified for the Bradford South East area during the plan period is not supported by the available evidence

² See paragraph 4.25 of Background Paper 2: Housing (Part 1) (SD/016)

and will result in objectively assessed needs for housing across the district not being met.

Questions 6.3 b - h:

1.19 CEG has no further comments to make.