

Bradford Local Plan

Core Strategy Examination Session day Five

Matter 4C: Housing Distribution

Date: 11th March 2015

Venue: Victoria Hall, Saltaire

Policy HO3

Distribution of Housing Development

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)?

1. Council's Response

- 1.1. Within the Core Strategy, Policy HO3 sets individual targets for housing development for each settlement and therefore within each tier of the settlement hierarchy under Policy SC4. Its goal is therefore to both illustrate how and where development can be located to meet the districts housing needs and provide a clear strategic basis for the production of the Allocations DPD, the two Area Action Plans and any Neighbourhood Plans.
- 1.2. The Council considers that Policy HO3 is a vital element of the strategic planning framework within the Core Strategy and vital to the speedy and efficient progress towards adoption of an Allocations DPD. It will therefore play a key role in ensuring that there is a boost to housing supply and that housing need is met in a timely fashion. Throughout the Core Strategy process the various stages of consultation have shown that there is, not unsurprisingly, a large degree of disagreement on future housing provision at a local scale whether it be from the development sector or from the general public. The Council has taken a decision to provide clear and detailed guidance down to a settlement and sub area level to ensure that the issues related to how Bradford is going to meet the challenging housing targets is aired, discussed and resolved now. With this policy in place the Allocations DPD will be able to concentrate on the right location and blend of land uses in each settlement and on the infrastructure necessary to support that development.
- 1.3. The Council is also aware of both the appetite for production of Local Neighbourhood Plans under the Localism Act, in some of the Parishes across the district and also of the understandable concerns that some of those communities have regarding the potential impacts of future development. It is vital that if Neighbourhood Plans are being produced that they have a clear strategic policy framework to work to, so that the focus of those local neighbourhood planning processes is on positive planning and supporting development and investment, whether it be in housing, infrastructure or the protection and enhancement of valued environmental assets. Policy HO3 will help ensure that the Local Neighbourhood Planning process has that clear framework to work to and in line with Government guidance is carried out in a positive way.
- 1.4. The Council accepts that there is a great deal of work to do to get allocations in place to meet housing need and also that the Allocations DPD stage will require the collection of more evidence and a finer grained assessment of that evidence on a site by site and settlement by settlement level. However it is very strongly of the view that a vast and considerable evidence base has already been collected for the Core Strategy which makes possible the creation of a detailed housing distribution at this stage. The Council has carefully examined and analysed this evidence and presented it for scrutiny within the evidence base documents, the Core Strategy itself and the Housing Background Paper 2 (SD016). The Council has also responded in detail to a range of objections and concerns to specific housing targets within Appendix 7J of its Statement of Pre-Submission Consultation (SD009). In the Council's view the housing distribution

proposed within Policy HO3 is justified by the evidence, is deliverable, soundly based and compliant with the NPPF.

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?

2. Council's Response

- 2.1. As indicated above, the Council considers that sufficient evidence is available to determine an appropriate housing distribution within the Core Strategy. The Council has used this evidence to come up with proposed targets which are reasonable given the evidence and represent the best options when the wide range of relevant factors are combined.
- 2.2. The individual settlement targets have been influenced by a variety of factors and criteria ranging from very strategic ones such as the Plan's Strategic Core Policies, in particular the Settlement Hierarchy, to more specific local factors such as land supply and environmental constraints.
- 2.3. Even though the final targets are relatively detailed and are settlement specific the process of deriving those targets has to start off with some strategic building blocks – policy assumptions and goals. The two core strategic building blocks have been the evidence on the drivers of population and household growth which result in the need for new homes and the hierarchy of settlements within the district. The former, the drivers of housing need, as revealed within both the Strategic Housing Market Assessment (SHMA) (EB052) and the Housing Requirement Study (EB028 – EB033) are the expected natural increase (births minus deaths) in the district's population driven by a relatively young age profile and continued international migration. Clearly the main urban areas of the district exhibit the youngest age structures and have had historic and established patterns of international migration from both commonwealth countries and more recently the EU. This means that there is a strong argument for the overall housing distribution to be focused on the urban areas in particular the Regional City. The precise degree of concentration and focus of housing growth may be a matter of debate but the need for a focus is hopefully beyond reasonable argument.
- 2.4. The second strategic building block for deriving a housing distribution is the settlement hierarchy. The Council's proposed settlement hierarchy is set out in Policy SC4. This again is a key factor since the settlement hierarchy has been determined by reference to the size, role and function of each settlement and the range, and balance of services both within that settlement and accessible to that settlement. Settlements with good transport links, particularly good public transport links feature in higher tiers of that hierarchy. Thus any broad approach to housing distribution which has strong regard to the settlement hierarchy is already pre-disposed to being a sustainable option because the development which does occur will be focused in sustainable locations.
- 2.5. Therefore at each stage of the preparation of the Core Strategy the Council has attempted to put forward a distribution which follows the strategic principles of a focus on the urban areas and the use of the settlement hierarchy.
- 2.6. The precise targets and the levels of development however also have to reflect – and have reflected – a variety of other evidence. Firstly the distribution also has to reflect the available land supply as indicated in the Strategic Housing Land Availability Assessment (SHLAA) (EB049). The SHLAA provides useful guide to the approximate upper limits to potential housing targets (if no other factors needed to be assessed) as

it has assessed the extent of deliverable and developable land supply on a settlement by settlement basis. However this is not enough on its own. The nature of that land supply has to be assessed and here again the SHLAA is useful as it provides an indication of the split between green field and previously developed land, between in settlement and edge of settlement options, and the extent of green belt change, if any, which may be required within each settlement. The SHLAA therefore provides both absolute evidence of whether certain targets are deliverable, provides an indication of where spare capacity might exist if alternative distribution quantum were put forward and also illuminates the environmental implications of a given approach.

2.7. Secondly the distribution has also been assessed against information on a range of environmental constraints. The Council's approach within Policy HO3 therefore reflects:

- The results of a district wide Growth Assessment (EB037) which has confirmed that it will be possible to deliver and manage change in the district's green belt boundaries in a way which still maintain a robust green belt at local and strategic level and which still promotes development in sustainable locations. In many ways this reflects the fact that Bradford's green belt boundary has been drawn very tightly into the edges of existing settlements meaning that there are many green belt locations which are relatively accessible to local services and transport routes;
- The results of a Strategic Flood Risk Assessment (EB048) and more specifically a sequential flood risk assessment. The latter has shown that in the vast majority of settlements the proposed housing targets can be met entirely within the lowest flood risk zone.
- The results of a Habitats Regulations Assessment HRA) (SD022) - here the impacts of the analysis have been felt more acutely in some of the Principal Towns and lower order settlements – settlements where potential sites are located within 2.5km of the designated South Pennines Special Protection Area (SPA) and Special Area of Conservation (SAC) and where based on the analysis of the HRA the Council are advocating a precautionary approach to ensure that the loss or degradation of areas outside of the designated sites but yet important to those sites (for example by providing foraging resources) is minimised.

2.8. Thirdly the distribution has taken account of other contextual evidence including:

- Transport and infrastructure – it has been clear from the outset that the level and scale of development required to meet future need will provide challenges and will require significant intervention and investment. While objectors concerns naturally reflect the perceived situation of services and infrastructure in their own areas, services and infrastructure are stretched and in some places at and beyond capacity in many areas across the district. The Council has produced a Local Infrastructure Plan (EB044), liaised with infrastructure providers and considers that the Core Strategy rather than creating infrastructure problems, will actually provide the basis to begin to tackle the forthcoming issues by giving certainty to service providers and utility providers of the future level of growth so that they can develop their short and medium term investment plans;
- The need for the distribution to reflect the priority for regeneration and the Council's key focus on areas such as the City Centre, the Canal Road Corridor and the Airedale Corridor (in particular the settlements of Keighley, Bingley and Shipley);
- The need for the distribution to provide homes in lower tier settlements to support local need, maintain their vitality, support local services and therefore community cohesion, and provide affordable housing;
- The need for the distribution to reflect deliverability and viability issues; on a site by site basis the Council's SHLAA has assessed whether there are any site related deliverability constraints such as land ownership, access issues, steep slopes and so on. It has also sought the views of the Working Group on how general market

conditions in each area might affect the likelihood and the timing of delivery; the Plan has also been informed by a full local plan Viability Assessment (EB046).

- 2.9. It should be stressed that the interplay between strategic factors and more detailed environmental and land supply factors is different in each settlement. So for example the need to reflect the 2.5km SPA buffer zone affects some settlements and not others, land supply is more of a constraint in some settlements than others, flood risk is more of a constraint in some areas than others and so on. The Council's Housing Background Paper has therefore indicated the key factors which have affected the final housing target and also benchmarked that target against a baseline distribution which reflects only the size of the population within that settlement (SD016).
- 2.10. The Council therefore considers that a wide range of evidence has been collected to inform and justify the proposed housing distribution. Inevitably the factors which are most relevant to the proposed distribution vary from settlement to settlement. The Council's Housing Background Paper (SD016) and its Statement of pre Submission Consultation (SD009, Appendix 7J) give a detailed outline of the key factors on a settlement by settlement basis.

Does the policy pay sufficient regard to viability considerations?

3. Council's Response

- 3.1. The Council considers that Policy HO3 pays sufficient regard to viability and deliverability considerations. In particular it would argue that the evidence and analysis on viability is both adequate and proportionate to the strategic level of planning involved.
- 3.2. Viability and deliverability are already built into the process via the evidence base as envisaged by the NPPF. The plan has been informed by 2 SHLAA's (with a third nearing completion) both of which assessed the deliverability of sites and included house builder input, through Working Group and also by the Affordable Housing Economic Viability Assessment (AHEVA) (EB025) and the Local Plan Viability Assessment (EB046).
- 3.3. The Council accepts that viability in parts of the urban areas is challenging under the current economic conditions, and in this sense Bradford is in no different position to many other northern towns and cities. However the Local Plan Viability Assessment underlines the need to consider viability over the full economic cycle and over the whole of the plan period to 2030. It should also be pointed out that the concentration on the Regional City has been moderated and adjusted downwards slightly compared to what could have been proposed based on land supply, settlement hierarchy and regeneration considerations alone partly as a result of deliverability factors.
- 3.4. The Council would also point out that even in those areas where viability is challenging the Council's approach to land release – in particular its adoption of relatively low previously developed land targets and acceptance of the need for significant green belt releases – will act to support delivery.
- 3.5. Finally it should also be noted that within the larger urban areas and particularly within Bradford there will be ongoing and active public sector intervention to both improve the context for investment and also to directly secure the development of sites. This is

particularly the case within the Canal Road Corridor but also in other areas such as the City Centre and Holme Wood.

- 3.6. A Local Plan Viability Assessment has been produced to review all the policies in the Core Strategy in terms of any potential impact on viability. Policy HO3 does not have a direct impact on viability as it does not set standards (EB046, Table 3.2 p.17). The Council's approach to balancing viability and safeguarding deliverability is highlighted in the Viability Assessment Update 2014 (EB046, paragraphs 5.1.1 to 5.1.4). This includes the introduction of a dedicated policy relating to delivery and funding (Policy ID8) outlining how the Council will intervene to assist delivery and the commissioning of delivery strategies for each of the AAP areas (City Centre and Canal Road Corridor) to identify means for assisting the delivery process (EB046, paragraph 5.1.2). This clearly demonstrates that the Council recognises viability and delivery issues across the district and has put in place policies to support delivery, particularly in areas where viability is identified as challenging in the Local Plan Viability Assessment.
- 3.7. The Viability Assessment Update 2014 concludes that the combination of site constraints and market frailties mean that plans for growth and regeneration will require intervention to facilitate delivery in the short term, particularly in respect of priority sites in inner Bradford (EB046, paragraph 5.1.4). The Council will undertake further work under Policy ID8, as recommended in paragraph 5.1.4 of the Viability Assessment Update 2014, to demonstrate how these sites can be brought forward for development through subsequent Development Plan Documents including the Allocations DPD and two AAPs.

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

4. Council's Response

- 4.1. The Council considers that the proposed distribution of housing does indeed reflect an adequate level of evidence and analysis with regards to infrastructure and highways and transport modelling. The Core Strategy has been informed both by the district wide Transport Study (EB039) produced by consultants Steer Davies Gleave and by its Local Infrastructure Plan.
- 4.2. The Plan has also been informed by the settlement study and Growth study which consider by settlement their current role and service and facilities.
- 4.3. The Sub area policies include policies which identify key infrastructure required to support the development within the respective areas, though not exhaustive and needs to be read with the LIP.

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

5. Council's Response

- 5.1. As indicated above the Council has been careful to test and re-assess its housing distribution against a range of environmental criteria and policies.
- 5.2. This has included the SHLAA which has fed into this process in two ways. Firstly it has already screened out land supply sites and options in locations affected by designations where national policy would normally rule out development. These are

predominately but not exclusively areas designated for their national or international importance. It is important to stress that the number of instances of such national policy apply in such an absolute way are quite limited. For most environmental constraint based designations – including green belt – development has to be judged against the circumstances facing the Local plan review, and the local context . The constraints used within the SHLAA which classify sites as unsuitable include:

- Sites within the green belt where not contiguous to the built up area;
- Sites within areas of national or international wildlife importance – SSSI's, SPA & SAC
- Sites within Class 1 Archaeological areas;
- Sites within flood zone 3b;
- Sites in proximity to Health and Safety Executive (HSE) designated major hazard sites or hazardous installations;

- 5.3. Secondly the SHLAA has enabled the Council to take account of the nature of the land supply in each settlement in particular the split between green field and previously Developed Land (brown field) sites and the number of sites which are impacted in whole or part by designated green space, Tree Preservation Order's (TPOs), conservations areas, and by flood risk zone 2 and 3a. In many cases these designations are such that development would not necessarily be ruled out and would instead affect the scale of development, site layouts and the mitigation measures needed to make those site developments acceptable.
- 5.4. The SHLAA alone has therefore already embedded a good deal of analysis and input on environmental constraints into the proposed housing distribution. However this is not the only way in which the Council has tested, modified and derived its proposed distribution. It has also carried out a sequential flood risk assessment and the vast majority of the targets have been set at a level which can be met via the lowest risk zone 1 areas. The only exceptions to this are in the City Centre, Canal Road and Shipley where small amount and proportions of flood zone 2 and 3a land may be required. In these cases the Council has considered alternatives but considers that the limited use of a small number of sites in higher risk zones are justified both via the regeneration and sustainability benefits of securing development in those areas and by the relative lack of other sustainable options.
- 5.5. As has been detailed within other Council position statements and background papers, the proposed housing distribution has also been informed by the results of the Habitats Regulations Assessment. This has resulted in a moderating downwards of targets for some settlements, where land supply options fall within the proposed 2.5km precautionary zone, to levels lower than those proposed within the Core Strategy Further Engagement Draft. The Council considers that its approach in this respect is a balanced and proportionate approach to the evidence gathered. It does not consider that there is any justification for a further lowering of the proposed targets within settlements such as Ilkley on HRA grounds and would point out that the HRA does not rule out all development within this zone.

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

6. Council's Response

- 6.1. The Council has in earlier sections of this statement set out the extensive range of evidence which has underpinned the Core Strategy's proposed housing targets.

- 6.2. The only further point which the Council would wish to draw to the attention of the EIP is two evidence base updates. The first of these is the latest update to the SHLAA which is nearing completion. The nature of the update and the stage reached in the work is outlined in the Council's position statement on housing supply for Policy HO2. Provisional updated settlement capacity totals are attached to both that and this position statement (see Appendix 1). The SHLAA update suggests that revised capacity levels are at or significantly above Core Strategy proposed housing targets in the vast majority of cases. It shows a small number of settlement areas where supply is tight. Where these are in relation to larger settlements there is less cause for concern as these areas have the greatest potential for the identification of further new sites either from recycled land or from additional local green belt releases which might result from the green belt review envisaged as part of the Allocations DPD process. The SHLAA shows a small deficit in the Bradford North East Sub area which might justify a small change to the target which would need to be progressed as a main modification dependent on the Examination In Public debate on the proposed targets within other settlements.
- 6.3. The settlement with the largest deficit is Shipley where there is an initial shortfall indicated of around 450 dwellings. The shortfall results from a combination to changes which have been made to the boundary of the Shipley settlement area and changes to site assessments.
- 6.4. The SHLAA update provided 2 sets of data tables for the Shipley and Shipley & Canal Road Corridor areas. The first tables directly compared the capacity in the 2 areas against that within the first SHLAA study. However during preparation of the update the settlement boundaries changed markedly in these 2 areas, consequently a second pair of tables which reflected the newly revised boundaries and captured the capacity from sites which had moved between the 2 main affected settlement areas were produced as an appendix. In broad terms the Shipley & Canal Road Corridor area was expanded at the expense of the Shipley settlement area. Since SHLAA 2 further adjustments to the Shipley and Canal Road corridor AAP boundary has meant further site loss from Shipley, with further impacts caused by loss of sites to other development and changes to yield expectations on some sites after consultation with the SHLAA Working Group. Further detailed appraisal of sites and capacity has also been undertaken as part of work on the Shipley and Canal Road Corridor AAP.
- 6.5. The Shipley housing target will therefore need a downwards adjustment as a result of this work. The Council's suggestion and preference is to carry out any adjustment in a way which maintains the overall spatial and distribution strategy and which reflects the settlement hierarchy. This would mean looking to make up any reduction in the first instance in other parts of the Regional City and if not there then within the Principal Towns. Which of these options might prove most appropriate and sustainable will depend on the outcome of the discussion on a range of matters at the EIP itself.

Appendix 1 : Provisional SHLAA 3 Land Supply By Settlement & Comparison With SHLAA 2 Data

SETTLEMENT	SHLAA 2 Capacity	Provisional / Moderated SHLAA 3 Capacity	CSPD Proposed Target
City Centre	2752	5018.5	3,500
Canal Road	3599.5	3096.5	3,200
Shipley	1283	782	1,250
Bradford SE	6607	6036.5	6,000
Bradford NE	5171	4431.5	4,700
Bradford SW	6180	6749	5,500
Bradford NW	4745	5632	4,500
Regional City Total			28,650
Ilkley	1790	1841.5	800
Keighley	5233	4793	4,500
Bingley	2196	1700.5	1,400
Principal Towns Total			6,700
Queensbury	1748	1725	1000
Silsden	2026	2251.5	1000
Steeton	884.5	1263	700
Thornton	863.5	1066.5	700
Local Growth Centres Total			3,400
Addingham	1153	1137	200
Baildon	883.5	830	450
Burley In Wharfedale	1094	1291	200
Cottingley	681	275	200
Cullingworth	241	464	350
Denholme	848	662.5	350
East Morton	300.5	496	100
Harden	86	250	100
Haworth	695.5	852.5	500
Menston	1166.5	1062	400
Oakworth	495.5	576.5	200
Oxenhope	50.5	122	100
Wilsden	936	923	200
Local Service Centres Total			3,350
District Wide Total	53,708	55,329	