

AMENDED HOUSING DISTRIBUTION

INTRODUCTION

1. On Wednesday 11 March 2015 the Council presented a set of proposed amendments to the District housing distribution, the need arising from changes to background evidence - *Document PS/FO19 CBMDC EIP Matter 4C amended housing distribution*. It was considered the circumstances justified a **potential** main modification to the plan.
2. The Inspector has been clear that the remit of the Examination is the soundness of the plan as presented as opposed to the content of any potential and subsequent main modifications. He has also indicated that whilst the examination remains live he is open to comment or responses on any of the items posted by the Council, hence this note.
3. The document above contains only the briefest of commentary to support why the amendments have been made and how the new figures have been arrived at. Clearly, from the public hearing debate so far, the evolving position on the HRA aspect has played a key role in bringing forward the proposal and its apparent urgency.

SOME INTERESTING FACTS

4. In trying to understand the basis for the latest changes, *Background paper 2: Housing (Part 1) to the Core Strategy Publication Draft (SD/016)* provides much detail and many relevant facts. It tracks the settlement by settlement changes to housing distributions made between the Further Engagement Draft and the Publication Draft and shows
 - Reductions were made in the housing distributions to 20 settlements
 - In 11 of these settlements, HRA was the factor or one of the factors justifying the reduction
 - Of the others, the level of prospective green belt deletions was the factor or one of the factors supporting the reduction in 7 settlements
 - In parallel with the reductions, Burley and Menston were downgraded to local service centres
 - Burley's distribution was reduced from 500 to 200, whilst Menston's was reduced from 900 to 400, both therefore broadly comparable in terms of the amount of reduction
5. More background information is provided in the *Council's Further Statement Matter 4C Housing Distribution (doc PS/E004C)*. Appendix 1 of that document sets out the provisional and moderated SHLAA3 capacity compared with that from SHLAA2.
 - It confirms what is stated in the amended housing distribution that land supply totals for the Shipley, Bradford NE and Canal Road corridor settlements have reduced, but
 - It also shows that the SHLAA3 land supply for the Regional City grouping as a whole has increased by around 1,400

SOME INTERESTING QUESTIONS AND ISSUES

6. When considered in conjunction with the above, the proposed amendments to the housing distributions pose some interesting and relevant questions, for instance
 - Was consideration given to managing the land supply shortfall in three of the Regional City settlements from within the Regional City group as a whole – indeed, as was intimated in para 6.5 of the Council’s document (*doc PS/E004C*)?
 - Was consideration given to reviewing the distribution of all 11 HRA related settlements, rather than solely Burley, Ilkley, Menston and Silsden?
 - The restoration of local growth centre status for both Burley and Menston has led to an increase from 200 to 700 (+250%) for the former and an increase from 400 to 600 (+50%) for the latter – how are these huge differences explained, especially when the reductions to both at the FED to PD stage were broadly comparable?
 - If the HRA factor is to be regarded as no longer relevant, should green belt and other environmental constraints play a much larger part in assessing the need for moderation?
 - For instance, using the Council’s analysis of projected green belt deletions (*Background paper 2: Housing Part 1, Appendix 3 – doc SD/016*) only 50 of Burley’s new proposed requirement would be met from non-green belt land, the other 650 (93%) would be from green belt
 - Using the same reference document only 326 of Ilkley’s proposed new requirement would be possible from previously developed land, the remaining 674 (67%) would be from green belt deletions, this huge imbalance further exaggerated by the potential for Ilkley needing to meet the 5 Ha employment land target, plus a new secondary school and a park and ride facility from the same source
 - There has been much discussion at the public hearing about the need for a full or selective review of the green belt and the relationship with any broader based reviews ie the Leeds City Region – does the amended housing distribution severely compromise the integrity of any such review when pre-empted by the projected effects illustrated in the preceding two bullet points?
7. In conclusion, it is clear the Council has been placed under considerable pressure to respond to the HRA issues quickly and positively. It is also clear from the questions and issues prompted by this quick fit that a more studied and comprehensive analysis is required if reviewers are to subsequently accept that the outcome is fair, balanced and soundly based, and that it is consistent with the full range of policies and commitments described in the Core Strategy.
8. The Council is careful to state the amended housing distribution figures are proposals at this stage. Mr Andrew Wood, CPRE, supported by a number of community representatives, has set out various concerns about the principles involved. Hopefully, that plus the observations in this note will lead to a more fundamental review of the nature and content of any main modification and its implications.

Neil Varley

17 March, 2015 (On behalf of the Ben Rhydding Green Belt Protection Group)