

## **Bradford Local Plan**

### **Core Strategy Examination**

#### **Further Statement Relating to the Regional City of Bradford (Shipley & Bradford NE)**

**For :**

**Matter 3 – Revised Spatial Distribution of Development  
(Policies HO3 & BD1)**

#### **In Response to The Following Submissions:**

(PS/J004c)	Johnson Brook
(PS/J017)	Barton Wilmore on behalf of Persimmon Homes
(PS/J029)	Barton Wilmore on behalf of Keyland

**May 2016**

## **1. Introduction**

- 1.1. This statement sets out the Council response to Examination hearing statements to the MIQs issued by the Inspector and made by various parties relating to the Shipley and Bradford NE areas of the Regional City and is designed to assist the Inspector in considering the soundness of the Core Strategy and the questions posed within matter 3.
- 1.2. The Council has already submitted position statements for each matter and has responded in full to the representations made at main modifications stage within its Statement of Consultation. The Council's further statements therefore merely make supplementary points particularly in relation to new matters raised by participants or points of clarification.
- 1.3. The Council have not sought in these further statements to address matters which were not the subject of main modifications and which the Inspector has made clear will not be subject to further discussion within the hearings.

## **2. Response to PS/J004c (Johnson Brook)**

- 2.1. The Council is surprised by the assertion made by Johnson Brook in paragraph 6 of their matter 3 statement that the proposed changes to the housing apportionments within the Regional City are not based on any strategic planning reasons and are not justified. The Council has clearly set out its reasoning and linked the changes to the evidence base in particular the land supply data within SHLAA 3. The comments by Johnson Brook are all the more surprising given the widespread agreement among parties that the housing apportionment must be capable of being delivered and that one of the key tests is to align targets to land supply information within the SHLAA. It is unclear why Johnson Brook have resubmitted their proposed housing apportionment which shows a suggested 1,250 dwellings for Shipley when SHLAA data shows a land supply of only just under 800 units.

## **3. Response to PS/J029 (Barton Wilmore on behalf of Keyland)**

- 3.1. Barton Wilmore have made a hearing submission in support of their argument that the Bradford NE apportionment should be set at a higher level and / or revert back to the Publication Draft level of 4700 homes.
- 3.2. The main modifications, in particular MM87, have proposed a reduction in the Bradford NE apportionment from 4,700 dwellings to 4,400. The Council have explained that it has made this suggestion in the light of the updated land supply data within SHLAA 3. SHLAA 3 indicates a deliverable and developable land supply of 4,442 units which compares to 5,200 in the previous SHLAA.

- 3.3. The Council has set the proposed new housing apportionment close to this new land supply figure. In most cases the Council prefer there to be a reasonable level of additional supply over and above the proposed Core Strategy apportionment to allow for demand for other land uses and the possibility that some sites may be discarded once more detailed planning assessments are carried out as part of the Allocations DPD. However in the case of Bradford NE there is more flexibility than may appear to be the case since one of the reasons the future land supply figure has reduced in SHLAA 3 is because a number of sites which have contributed completions since 2013 and which were under construction at SHLAA 2 have now been fully implemented. The Council has also taken account of the fact that 95 of the 125 sites within the trajectory are classified as 'suitable now' and that recent development activity and planning applications in the area indicate a relatively healthy market.
- 3.4. However notwithstanding the above issues the Council would be very concerned by any proposal to increase the housing apportionment further. Most parties within the examination hearings appear to have been in agreement that the deliverability of any proposed target should be tested with and be consistent with the land supply position as set out in the SHLAA. The Council is therefore surprised by and in disagreement with the objector's statement within paragraph 12 that there is sufficient land supply within Bradford NE to support a higher quantum.
- 3.5. The Council also disagrees with the objector's assertion in paragraph 10 that the result of reducing the housing apportionment by 300 is that the Regional City of Bradford is no longer the prime focus for housing. Even after the main modifications the Regional City is assigned 27,750 units which is 66% of the district wide housing requirement.
- 3.6. The Council also rejects the implication in paragraph 11 that the Bradford SE figure is not deliverable due to viability issues. Bradford SE is a key regeneration priority for the Council and a considerable amount of master planning work has already been undertaken in support of the proposed housing growth.
- 3.7. The Council concludes that the proposed housing apportionment reflects the evidence base and represents a very sizeable but deliverable level of housing growth and that the respondent has provided no evidence or justification to support an increase to the housing quantum proposed.

#### 4. **Response to PS/J017 (Barton Wilmore on behalf of Persimmon Homes)**

- 4.1. The Council re-iterates many of the points above with regards to the objections made by Persimmon to the reduced Shipley apportionment. It is unclear why Persimmon would appear to ignore the limitations of land supply as indicated in SHLAA 3.
- 4.2. The Council accepts that Historic England (previously known as English Heritage) did not raise an actual objection to the previous housing apportionment for Shipley but this does not remove the fact that they did raise concerns that certain sites had the potential to have adverse effects on areas critical to the setting of the World heritage

Site. It also does not remove the fact that Historic England have supported the proposed reduced apportionment.

- 4.3. The Council do not dispute the suggestion made by Persimmon at paragraph 13 of their statement that Shipley is a sustainable location for development. However it does not agree with the assertion that the proposed level of growth is not commensurate with the size of the settlement. 750 dwellings is still a substantial level of development and account should also be taken of the fact that the town of Shipley is split between 2 settlement areas in the Core Strategy. The town centre and eastern section of Shipley lies within the Shipley and Canal Road Corridor Area Action Plan. That Plan, which has recently been submitted to the Planning Inspectorate, allocates land for 692 dwellings within Shipley. This is therefore in addition to the 750 dwellings which are proposed for the remainder of Shipley which lies outside the AAP area.
- 4.4. At paragraph 13 the respondent also remarks that the proposed level of growth is lower than that proposed within a number of the Local Growth Centres. Again the Council points to the real and larger level of growth proposed for Shipley as a whole but would also suggest that the settlement hierarchy alone cannot determine the proposed housing quantum which also has to reflect land availability and any other relevant evidence.