

**Consultation Response on Bradford
Metropolitan District Council
Core Strategy – Proposed Modifications**

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Date: January 2016

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Summary

Rural Solutions (RSL) on behalf of Barratt Homes and David Wilson Homes (BH&DWH) provide the following consultation response to the Proposed Main Modifications to the Bradford Metropolitan District Council (BMDC) Core Strategy.

These comments follow earlier representations made by RSL on behalf of BH&DWH and our attendance at the Core Strategy Examination hearing sessions in 2015.

In general BH&DWH consider that the Core Strategy provides a cogent and justified strategy for the District. It is acknowledged that the Main Modifications address some of the points raised in earlier representations. However, areas of concern remain which have *not* been addressed by the main modifications and these have implications in relation to the tests of soundness of the strategy.

In particular the proposed modification of housing numbers in only three of Wharfedale's four settlements which are included within the settlement hierarchy and the proposal to amend but not remove policy HO4's proposed phasing policy are of specific concern to BH&DWH.

**Issue 1: Proposed Amendment of Housing Numbers in Relation to only Three of Wharfedale’s Four Settlements
(Various Main Modifications, Principally MM88)**

Introduction

- I.1 BH&DWH has made previous representations, in its Examination Statement and earlier representations, in relation to the housing numbers for Wharfedale’s settlements.
- I.2 These representations have made specific reference to Addingham and the reduction in housing numbers from 400 houses proposed in the Council’s Further Engagement Draft Housing Distribution (October 2011) to 200 houses in the submission version Core Strategy.
- I.3 The principal reason for this significant reduction housing numbers in Addingham, together with the reduction in housing numbers in other settlements in Wharfedale, relates to the Council’s approach to the South Pennine Moors Special Protection Area (SPA). This approach was discussed in detail at the Core Strategy Examination.
- I.4 The reasons for the reduction of housing numbers in Wharfedale’s settlements are set out clearly in the Council’s background papers¹ to its 2014 Publication Draft.

Core Strategy Publication Draft (2014) Background Paper 1: Overview (Update)

- I.5 In particular Core Strategy Publication Draft (2014) Background Paper 1: Overview (Update) Section 9.0 Habitat Regulations Assessments sets out the justification for a reduction in housing numbers in Wharfedale.
- I.6 Paragraph 9.8 includes ancillary reasons for the reduction not related to the Habitat Regulations Assessment:

“9.8 The need to derive a revised housing distribution (in all settlements not just Wharfedale) in the CSPD depended not only on the HRA but also on a range of other factors including:

· A revision to the total district wide housing target – as a result of an updated objective assessment of housing need and updated evidence, the CSPD proposed a small reduction in the total housing target as compared to the CSFED. Thus even without considering any other factors an identical proportionate distribution of the district wide housing target would have resulted in a small reduction in the housing targets for the Wharfedale settlements; (our emphasis)

¹ Core Strategy Publication Draft (2014) Background Paper 1: Overview (Update) and Core Strategy Publication Draft (2014) Background Paper 2: Housing (Part 1)

· *Consideration of updated evidence, in particular the SHLAA. The updated SHLAA showed a significant uplift in total district wide capacity for a number of reasons which are explained in the Housing Background Paper. This was significant in that capacity within the main urban areas of Bradford were significantly higher and there were more potential distribution choices available to the Council on land supply grounds than was the case at the time of preparation of the CSFED. The growth areas of Menston and Burley in Wharfedale were, for example, identified in the CSFED not only because of their relatively sustainable locations for some growth but also because of the constraints on allocating a higher proportion of the district wide housing requirement to the regional city.”*

RSL Comment: In relation to the first bullet point of paragraph 9.8 a reduction in Addingham’s housing number from 400 to 200 cannot be described as a ‘small reduction’. With regard to the second bullet point this relates only to growth areas (Menston and Burley in Wharfedale) and cannot be considered to provide justification for the Addingham housing number.

- 1.7 Notwithstanding the above points, paragraph 9.9 makes it clear that it was the South Pennine Moors SPA issue that was the principal reason for Addingham’s housing number reduction:

“9.9 Having said all of this, as far as Wharfedale was concerned, the potential direct and indirect impacts of the CSFED’s housing proposals on the SPA and its 2.5km buffer zone was the main driver for the changes eventually incorporated within the CSPD.”

- 1.8 Paragraphs 9.10 to 9.20 of Background Paper I explains the implications of new Habitat Regulations Assessment work on housing numbers in more detail.

- 1.9 Paragraph 9.21 of the paper then explains the ‘precautionary approach’ taken to Addingham:

“9.21 A precautionary approach was also taken in Addingham – here the overall discounted capacity, although very significantly reduced, still lay above the CSFED housing target. However in this case account was also taken of the following factors:

- 1. The large cluster of recorded birds just to the south of the settlement;*
- 2. The overall recommendation of the HRA to reduce housing numbers in areas close to Rombalds Moor on account of potential direct and indirect impacts;*
- 3. Finally and most significantly Addingham’s relative sustainability, its position in the fourth tier of the settlement hierarchy and the increased developable supply within the Regional City in the second SHLAA which allowed a modest redistribution away from fourth tier settlements;”*

RSL Comment: Notwithstanding the comments in bullet point 3, the issue of the impact of HRA work on Addingham is clearly set out throughout section 9 of Background Paper 1, as well as in Background Paper 2. In no way can the reduction from 400 to 200 houses can be considered a ‘modest redistribution’ and Background Paper 2 refers to a ‘significant reduction’ in Addingham’s housing number (as a result of the HRA work).

Core Strategy Publication Draft (2014) Background Paper 2: Housing (Part 1)

I.10 The paper includes a section starting at paragraph 5.13 entitled ‘*The Habitats Regulations Assessment (HRA) & Associated Survey Work*’. Paragraphs 5.13 and 5.14 summarise the findings of this ecological work as it relates to Wharfedale’s settlements.

I.11 Paragraph 5.15-5.17 then sets out how the Council has applied these findings to housing numbers:

“5.15. Based on this advice the Council’s approach was twofold:

- To seek a significant reduction in the settlements most severely affected so that both the direct affects from development sites and indirect affects relating to population increase and associated increased recreational activity were removed or reduced to acceptable levels;*
- To reduce settlement targets to a level where those targets could – if necessary – be met entirely or predominantly from sites not identified as containing key sensitive habitats or where the species for which the SPA has been designated where not observed.*

5.16. The settlement housing targets within the Publication Draft have therefore been informed by the full HRA and the survey and mapping work underpinning it. The settlements most affected by the SPA 2.5Km buffer zone and with consequent adjustments to their housing targets are:

- Addingham*
 - Ilkley*
 - Burley In Wharfedale*
 - Menston*
 - Silsden (eastern part)*
- (our emphasis)*

I.12 Page 54 of the paper includes a SHLAA Land Supply Commentary which notes as follows:

“The target for Addingham has been significantly reduced since the CSFED as a result of the HRA. However the remaining target, based on the available sites should be able to be delivered without

impinging on the most sensitive areas indicated in the HRA survey work. No green belt would be required to meet the revised target.”

RSL Commentary: Comments in Background Paper 2 focus exclusively on the impact of HRA work on Addingham’s housing number. No reference is made to any reduction based upon sustainability of other factors.

Commentary on Main Modifications relating to Wharfedale Settlements Housing Numbers

- I.13 One of the most significant issues discussed at the Core Strategy examination was the impact of HRA work on Wharfedale’s settlements. In particular the impact of this work on the downgrading of Burley-in-Wharfedale and Menston from Local Growth Centres to Local Service Centres and the reduction in housing numbers for these settlements (700 to 200 for Burley-in-Wharfedale and 600 to 200 for Menston) was considered.
- I.14 BH&DWH note that as a result of the outcome of the Examination, a relatively large number of Main Modifications are based upon the implications of revised HRA work and in particular the proposed South Pennine Moors Special Protection Area.
- I.15 BH&DWH support these changes.
- I.16 BH&DWH notes the reversion in Main Modification MM88 to higher housing numbers for Burley-in-Wharfedale and Menston, as a result of these changes, as well as the increase of Ilkley’s housing number from 800 in the Publication Draft to 1,000.
- I.17 The ‘Reasons for Modification’ commentary in relation to MM88 states as follows:
“The Ilkley target is adjusted largely as a result of the revised HRA. Burley In Wharfedale and Menston are re-instated as Local Growth Centres (and thus removed as Local Service Centres) with higher housing targets largely as a result of the revised HRA.”
- I.18 BH&DWH strongly objects to the proposed modification (increase/reversion to previous figures) of housing numbers for three of Wharfedale’s four settlements (Ilkley, Burley-in-Wharfedale and Menston) in the settlement hierarchy but not Addingham.
- I.19 BH&DWH objects to Main Modification 51 as this proposes the amended distribution. As shown in the table below this clearly sets out the very clear disparity between the approach to Addingham and to the other Wharfedale settlements, which have been similarly effected by HRA work:

The broad distribution of housing development is shown as follows:

	Number of residential units
Ilkley	800 <u>1,000</u>
Burley In Wharfedale	200 <u>700</u>
Menston	400 <u>600</u>
Addingham	200

Fig.1 Extract from Main Modification 51 showing clear disparity between approaches to Wharfedale settlements.

- I.20 BH&DWH objects to Main Modification 52 which apportions only 200 houses to Addingham. The Main Modification includes additional text indicating that housing provision will be made in Burley-in-Wharfedale “with a significant contribution from green belt changes” and in Menston “from some local green belt changes.”
- I.21 We do not consider that it is necessary for differing levels of Green Belt release to be referenced in the text. It is the case that nearly all settlements in the plan area will require some Green Belt release. This includes Addingham.
- I.22 It is clear from Background Papers 1 and 2 that Addingham’s housing number was reduced by 50% primarily on the basis of HRA work.
- I.23 The failure to modify the housing number for Addingham, as a result of amended advice from Natural England and the proposed amended contents of Main Modifications leaves the Core Strategy potentially unsound.
- I.24 In our opinion the proposed modification of the Core Strategy in this way fails the four tests of soundness. It is particularly clear, based upon the Council’s own commentary in its Background Papers that the ‘significant reduction’ in Addingham’s housing number is *not justified*.
- I.25 The Council’s Evidence Base² demonstrates the following four ‘Key Planning Issues’ for Addingham.

- *Population imbalance and an ageing population;*
- *Lack of and need for affordable housing within the village is a key issue;*
- *Availability of local school places;*

² LDF Evidence Base Bradford District Settlement Study Update – October 2011

• *Protection of green spaces;*”

- I.26 In relation to the effectiveness of the Core Strategy (with a housing number of 200 for Addingham) and its consistency with national policy, BH&DWH considers that the significant reduction in the settlement’s housing number is unlikely to address the first two key planning issues noted above, effectively. In particular the reduction by half of the overall housing provision for Addingham is likely to result in a reduction by (at least) half in the amount of affordable housing provided in the settlement, as the amount of affordable housing delivered on mixed-tenure sites reduces.
- I.27 Our assessment of 2001 and 2011 census data for Addingham shows that the population aged significantly. A fall by 164 of residents aged 30-44 (set against an overall increase of 131 in the population) is particularly concerning. Ageing populations in Wharfedale’s communities and a low-level of and high need for affordable housing are highlighted as key housing market issues in Bradford’s SHMA 2013 Update. The reduction by half of the proposed allocation to Addingham will reduce the amount of affordable housing delivered and on that basis is likely to have an adverse impact on the retention of working age people in Addingham, to the detriment of social sustainability.
- I.28 In terms of green space, the Council’s evidence base also refers to the lack of a park in Addingham and gaps in the provision of children’s play areas. Reference to ‘smaller scale development’ at SC4 and reduction by half of the proposed housing allocation, will not only cause housing market problems but will also mean that opportunities to fill these gaps in provision may remain unmet. In light of the revised HRA Addingham can now be afforded more growth. All settlements identified as Local Service Centres have been selected on the basis of their sustainability credentials, with housing numbers apportioned to such settlements previously ranging from 100 to 500, now 100 to 350. Addingham is a sustainable location and is a good housing market area which can assist the Council in delivering its housing requirements and in particular help to deliver much needed affordable housing.
- I.29 BH&DWH strongly objects to Main Modification 55 as taken out of context it is considered that this downplays the role that Addingham can play in meeting housing need in Wharfedale. Whilst it might be factually correct to say that Addingham has seen a “*smaller scale of housing development*” this results from the restrictive nature of Green Belt around the settlement. Levels of historic growth are not based on the need for housing in Addingham; the ability of the development industry to meet this need; or the appropriateness in spatial terms of

accommodating housing in the settlement. It is based upon a local policy constraint which should be rightly reviewed as part of the policy making process. As acknowledged by Bradford Metropolitan District Council, Addingham is one of the sub-areas of the District that has the highest house price levels and therefore need for affordable housing.

- I.30 We object to any suggestion that smaller scale of housing development historically, based on Green Belt constraint, justifies the approach taken in the Main Modifications, which is to unfairly restrict housing development in Addingham whilst housing numbers in other Wharfedale settlements have reverted to higher levels.
- I.31 The LPA has previously indicated (Background Paper) that a figure of 200 houses could be provided in Addingham without Green Belt release. The Local Planning Authority should avoid any perception by others monitoring the plan-making process that the clear disparity between the increase of housing numbers for other Wharfedale settlements in the Main Modifications and the approach to Addingham, is based upon a reluctance to tackle the issue of Green Belt release in Addingham. It is important that the Council is seen to take a balanced and fair approach to the distribution of housing in Wharfedale with Green Belt release in all settlements. For the Core Strategy to be understood to be justified and effective it needs to be based upon a reversion to higher housing numbers for Addingham, now that previous HRA work has been revised. The reversion to a higher figure of 400 houses that was reduced based on earlier HRA work is required to ensure soundness. Whether or not the reversion does or does not require Green Belt release is of very limited relevance. Exceptional circumstances have been demonstrated for the release of Green Belt in Bradford District and it is important that this Green Belt release is applied across settlements in accordance with Bradford District Council's earlier work on the appropriate distribution of housing across the plan-area and Wharfedale in particular.
- I.32 BH&DWH requests that the Inspector carefully considers the omission from the proposed Main Modifications of a reversion of Addingham's housing number from 200 to 400.
- I.33 It is requested that this reversion to 400 houses, or at least an increase on the 200 houses arising from the '*significant reduction*' based on HRA work that has now been amended, is required by the Planning Inspectorate.

- I.34 If the approach to Addingham in relation to other Wharfedale settlements is not amended, BH&DWH would be left with no choice but to request that the Core Strategy examination is reopened in order to allow full consideration of this matter. The unjustified modification of three of Wharfedale’s settlements’ housing numbers without an associated modification of Addingham presents a potential area of legal challenge for the Core Strategy.
- I.35 While as noted in BH&DWH’s Examination Statement, the company *supports* the Council in relation to the general strategic policy approach of the Core Strategy and the overall housing figure for the District, it is considered that the approach to Addingham’s housing number and the future sustainability of the settlement, warrants further careful review.

Issue 2: Proposed Phasing Policy (MM89 and MM92)

- I.36 BH&DWH raised significant concern in its Examination Statement (pages 23-24) in relation to the proposal within the submission version Core Strategy to phase the release of allocated land. When considering MM89 and MM92 all of the comments included in the Examination Statement are considered to remain of relevance and are included at Appendix I to this representation.
- I.37 It is considered that the introduction of a phasing policy would mean that the Core Strategy, as it relates to housing delivery over the plan-period, is not positively prepared, justified, effective or consistent with national policy. Housing delivery will be constrained by the proposed phasing policy.
- I.38 Main Modifications MM89 and MM92 relate specifically to the proposed phasing policy. It is now proposed that land within the two Area Actions Plan being produced are not released in a phased way. However the more fundamental proposal to phase the release of land within the Allocations Development Plan Document covering the entire District remains unchanged.
- I.39 We note that MM92 includes an amendment of the supporting text for the policy to allow the potential release of second phase sites in the event that a five-year supply cannot be demonstrated.
- I.40 In our view rather than including complicated release arrangements that would allow the release of sites in the event that the Council’s supply falls below five years, the Core Strategy

should take a positive approach to boosting significantly the supply of housing in accordance with national guidance and not applying any phasing policy.

- I.41 BH&DWH objects to the inconsistent approach relating to the proposal not to make the two AAPs within the plan area the subject of a phasing policy. It is inappropriate for the Core Strategy to on one hand set out a phasing policy and set out principles to follow at the site allocations stage to select which sites should be allocated in phase 1 and which ones should be allocated in phase 2, whilst at the same time, in advance of the site allocations process, bypass this whole process for the AAP areas. We are very concerned in relation to the ability of the city centre housing market to ensure the delivery of significant levels of housing. While housing market conditions in the city centre may be slightly improving, BH&DWH would contend the assertion at page 66 of the Main Modifications document that “*The market within the City centre is changing at a rapid rate*” (our emphasis)
- I.42 On a fundamental level in relation to the need for a phasing policy, BH&DWH considers that the relationship between delivery of housing in the District’s more dispersed rural and semi-rural settlements and the delivery of brownfield sites in the city centre is tenuous. It also fails to acknowledge cross-plan area housing market issues where the delivery of housing is linked to factors beyond those that relate to brownfield city centre land. This is particularly the case in for example Steeton, Eastburn, Silsden and Addingham, whose housing markets are more closely linked to Craven District’s plan and housing market areas than to Bradford’s.
- I.43 It is not considered that any convincing justification for a phasing policy has been put forward prior to or within the proposed Main Modifications.
- I.44 Phasing policies have been removed from other plans at the examination stage, for example in the case of the Rotherham Core Strategy.
- I.45 BH&DWH requests that the Inspector carefully considers the need for and soundness of the phasing policy (as amended) which is proposed by policy H04.
- I.46 If a phasing policy remains then policy HO4 needs to have a mechanism to ensure that all settlements identified within the settlement hierarchy deliver housing constantly throughout the plan period. This aligns with proposed modification MM92 which states (paragraph 5.3.75)

that: *“However unless there are sound planning reasons not to do so all settlement and sub areas should make a contribution to and release some land within phase 1.”*

- I.47 It is important for the sustainability of local service centres that these settlements do not only receive housing allocations in any second phase (if a phasing policy is maintained).
- I.48 The phasing policy issues is a significant one for housing delivery in the District across the plan-period. BH&DWH would not wish to see the Core Strategy Examination reopened unless unavoidable but would need to request further public consideration of the phasing policy, if not amended or removed, in order to fully consider its implications and ensure the soundness of the Core Strategy.

Comments on Other Main Modifications

Main Modification 18

- I.49 BH&DWH supports Main Modification 18 which acknowledges that there needs to be Green Belt release to meet the plan-area’s housing needs and support economic growth. The need for housing and economic growth in the District provides the exceptional circumstances required by NPPF paragraph 83 for the amendment of Green Belt boundaries.
- I.50 BH&DWH has concerns regarding the distribution of housing as it relates other settlements, in addition:
- Main Modification 88 proposes an increase in Silsden’s housing number from 1,000 to 1,200 (NB: It is understood that Silsden’s housing number was incorrectly stated to be 700 in some parts of the Core Strategy when 1,000 homes were intended). This increase is justified (elsewhere in relation to MM83) on the basis of amendment of the HRA work for the plan-area.
 - The increased number for another settlement affected by now revised HRA work, in addition to all other settlements in Wharfedale, further serves to highlight the significant disparity between Addingham and all other settlements affected by HRA work.

- Silsden, which is a Local Growth Centre, now has a higher housing figure proposed than Ilkley (1,000 homes) which is a Principal Town.
- Addingham is situated just 3.9 miles from Silsden and could accommodate some of the additional housing proposed for Silsden.
- BH&DWH notes that housing numbers are reduced for Baildon and Haworth based on English Heritage concerns. Some of these reduced housing figures could be apportioned to other settlements at Local Service Centre level such as Addingham.
- BH&DWH remains concerned about the amount of housing being apportioned to Keighley. As noted in our Statement of Case for the Examination BH&DWH is currently developing out a housing site in Keighley, where low-market values constrain viability. It is considered that the housing figure for Keighley should be reduced and more housing apportioned to lower tier settlements (Local Growth Centres and Local Service Centres) where delivery is more likely.

Main Modification 92

- I.51 BH&DWH supports the inclusion of additional text (paragraph 5.3.75), as proposed by this modification, stating that
- “unless there are sound planning reasons not to do so all settlement and sub areas should make a contribution to and release some land within phase 1.”*
- I.52 BH&DWH objects to the proposed text (paragraph 5.3.77) as it proposes the ‘Liverpool method’ for meeting housing supply backlogs over the plan period as opposed to over the coming five years (‘Sedgefield approach’). The latter approach is in accordance with the NPPF and paragraph 15 requirement that sustainable development should proceed without delay, as well as the strategic requirement to boost significantly the supply of housing (paragraph 47).

Main Modification 96

- I.53 BH&DWH supports amendments to policy HO6 where the reference to using the brownfield percentages quoted as a ‘minimum’ requirement has rightly been removed.

Main Modification 100

- I.54 BH&DWH objects to changes to Policy HO9 where it now says that *“larger housing sites should include a proportion of new homes which are designed to be accessible and easily adaptable.....”* There is no justification why this policy approach should only apply to larger housing sites. Furthermore it should be an aspiration policy rather than a requirement. Not all large housing sites will necessarily require provision and sometimes it may not be feasible due to market conditions or viability. Therefore not every large housing site can commit to this. It is considered that part C of the policy should be deleted.

Main Modification 105

- I.55 BH&DWH supports the introduction of supporting text to policy HO9 which reflects the fact that viability is a factor that must be taken into consideration when determining an appropriate housing mix.
- I.56 BH&DWH objects however to this main modification in relation to the proposal for sites of 10 or more dwellings to provide a proportion of accessible homes. The Council has not provided any housing need assessment or other evidence which demonstrates that this should be required. The policy therefore fails the test of justification as regards soundness.
- I.57 There is no reason (or evidence based justification) why developers within Bradford District should be required to exceed the national minimum requirements. Minimum requirements are there for a reason. This draft local policy also seeks to cover legislation controlled within building regulations. Criteria C should be removed from the policy as this can be adequately dealt with via building regulations and the inclusion of an unjustified locally specific policy such as this will only serve to constrain housebuilding in the plan-area, where the scale of development and viability challenges are already significant.

- I.58 In any event not every site above 10 dwellings will be able to provide a proportion of accessible homes. Each site will be different as it will depend on the existing housing stock, demand, needs in the local area and viability etc.

Main Modification 107

- I.59 BH&DWH objects to this main modification and in particular the following text proposed:

“For residential developments the council will apply the national space standard as a benchmark for assessing the suitability of the proposed space standards of new homes. This will allow particularly small homes to be identified, and where necessary, the council will seek to understand the reasons for any significant variation from the national space standard. Where feasible and / or viable new homes should meet at least the minimum internal floor areas as set Bradford Local Plan Core Strategy – Proposed Main Modifications – November 2015 83 out in the Nationally Described Space Standard (or any subsequent national space standards)”

- I.60 The Council has not undertaken the necessary evidence work to introduce new space standards. National Planning Practice Guidance “Housing- Optional Technical Standards / Internal space standards” (our emphasis) section provides guidance on this matter.

- I.61 Paragraph 020 Reference ID: 56-020-20150327 considers that:

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies.”

- I.62 The paragraph goes onto state that as part of this justification Councils must undertake necessary work on the need for space standards; the viability of introducing the impact of space standards; and the timing of the introduction of standards, in order to prevent any adverse impact upon delivery.

- I.63 Firstly we are unaware of the need for internal space standards in the plan-area, particularly as it relates to new build housing. If the LPA’s concern is related to conversion of existing properties or sub-division of existing properties then policy guidance should be suitably specific and policy should relate to this development type only. A restriction should not be

applied which relates to new build housing where the market is delivering houses of a suitable size.

- I.64 Even if a need can be identified for all new homes to be the subject of space standards then the necessary work needs to be undertaken on viability and the timing implications of introducing a policy. Only then can a policy be proposed and consulted upon.
- I.65 The Council is proposing a policy which has not been justified or viability tested. Reference to national space standards should be removed from the Core Strategy otherwise it will make the plan unsound.

Ends.

Appendix I: Comments from BH&DWH's Examination Statement which relate to the Core Strategy's Proposed Phasing Policy

“Policy HO4 – Phasing & Release of Housing Sites

Question 7.5a. What is the justification for the Council's proposed approach to phasing and releasing housing sites?

1.99 BH&DWH is concerned that policy HO4, which proposes to split the plan period into two in terms of housing delivery, is overly complex and is not adequately justified.

1.101 The stated aims for the policy are to manage infrastructure delivery and maintain a brownfield focus, however there is insufficient evidence to indicate that this approach, which is not in accordance with national policy, is justified or necessary.

1.102 Outside of the main urban area and in, for example, a Local Service Centre there may not be any brownfield sites which need to be prioritised and development upon one or more large housing sites could provide all of the necessary infrastructure to meet the needs of new residents.

1.103 The policy makes the assumption that new development will only provide infrastructure which meets the needs of future residents, whereas in reality, larger housing developments can often deliver infrastructure on-site e.g. green infrastructure or off-site e.g. significant contributions to community facilities or education facilities, which actively benefit existing residents. The policy and its justification also lacks reference to the fact that larger developments and the infrastructure they provide will often be phased over a long period, ensuring that infrastructure provision keeps up with housing supply

Question 7.5b - Is the approach to phasing in line with national guidance (NPPF; ¶ 47)?

1.104 Reference is made in relation to Matter 4a to the Rotherham Core Strategy report and the Inspector's conclusion as to why a phasing approach would constrain housing delivery and not accord with the NPPF and required its removal.

Paragraph 49 of that report states:

“The Council explains that it has not prepared a detailed phasing policy to assist in delivering site allocations during the plan period but points to the need to prioritise the development of the most sustainable sites and the reuse of previously-developed land. This approach is set out in Policy CS3. It would appear, however, to be a phasing policy and, even though the Council considers that it would apply to no more than a handful of sites, it does not accord with the Framework. The approach of the Framework is to promote sustainable development which should go ahead without delay. Sites should be tested to ascertain whether they are sufficiently sustainable and deliverable to justify their

development rather than phased according to their degree of sustainability. A phasing policy holding back greenfield sites until all or some previously-developed land is suitably re-used would have a beguiling attraction, but the status of any site as previously-developed land should be seen as just one consideration, albeit in some cases an especially important one.” (RSL underlining)

1.105 Paragraph 99 of the report goes onto conclude that:

“...Anything which proposes or implies the phasing of a site or sites in preference to others should be excised.”

1.106 There are not considered to be any reasons in this instance, why a phasing approach, which would apply to more than ‘a handful of sites’ and therefore may have more serious implications in terms of housing delivery should not be similar rejected.

Question 7.5c - Would the phasing approach lead to shortfalls in housing provision, putting at risk 5-year housing land supply?

1.107 In relation to meeting BMDC’s housing need and its ability to demonstrate a 5-year housing land supply it is not clear how the first 8-year phase would provide for the requirement to meeting housing undersupply, using the Sedgefield method, over a 5-year period.

1.108 It is considered that a sound approach to housing delivery would involve the removal of a phasing policy and the identification of appropriate sites on site-by-site and settlement-by-settlement basis.

1.109 This approach would meet with the NPPF requirements established at paragraph 47, for Local Planning Authorities to ‘boost significantly the supply of housing’ and ensure consistency of supply and accord with the wider aim of the NPPF that appropriate development should proceed ‘without delay’.”