

Bradford Core Strategy Proposed Main Modifications – November 2015

INTRODUCTION

This response has been prepared on behalf of a consortium of house builders / strategic land developers represented at the EIP in March 2015 plus an additional landowner in Menston and in the South West Bradford sub division in relation to their land interests within the Bradford District. Previous submissions have been made on behalf of the consortium to the Publication Draft Core Strategy as well as statements submitted to the Core Strategy Examination and attendance at the Examination.

A separate response will be submitted in relation to the CIL consultation.

SECTION 3: VISION, OBJECTIVES AND CORE POLICIES

SPATIAL OBJECTIVE 2

MM1

We support the addition of the words 'in full' subject to our comments on other modifications. With specific regard to future provision of employment land and the need to find at least 135 ha within the plan period (see our later comments with regard to MM65, 66 & 149), we recognise some of the difficulties associated with providing strategic and sustainable sites which do not have topographical and other constraints. In this context we consider that there is scope under the duty to cooperate to provide an element of Bradford's employment land requirements within the Kirklees District part of the Strategic M606 corridor. This location is within a highly sustainable commuting distance of the large residential populations within South Bradford.

POLICY SC1 – OVERALL APPROACH AND KEY SPATIAL PRIORITIES AND

POLICY SC4 – HIERARCHY OF SETTLEMENTS

MM2, 7, 8, 9, 11 AND 12

We support the re-inclusion of Burley in Wharfedale and Menston as Local Growth Centres.

MM4

We do not consider that this proposed main modification clarifies the definition of 'Hubs' and instead confuses the point. It seems to suggest that all individual Principal Towns and Local Growth Centres are in their own rights 'key hubs'. The Principal Towns should all be defined as key hubs for the local economy, housing and community and social infrastructure and for the catchments they serve. The

identified Local Growth Centres have different relationships with the Principal Town with which they are most closely associated. Steeton with Eastburn plus Silsden do form a local hub. Burley and Menston are within the general catchment of Ilkley with strong transport links to this Principal Town but Menston in particular also has links with the towns of Otley and Guiseley in Leeds. These relationships and their relevance to future spatial planning could, we suggest, be better explained in the sub area policies and their supporting text with an appropriate cross reference in policy SC1. The three sentences in the proposed added text do not clarify whether 'the hub' is a single higher order centre or a multi – centre. The inclusion of the latter in the proposed text is the main source of confusion.

POLICY SC5 – LOCATION OF DEVELOPMENT

We object to the lack of modifications to the first part of this policy (Part A). The prioritisation of major brownfield and city centre sites has significant deliverability issues, where such sites often have issues of viability. Our objections to the Publication Draft Core Strategy in relation to Policy SC5 remain valid and are repeated below for convenience:

This policy is in our opinion unsound. Giving first priority to brownfield sites is not supported by the NPPF which uses the word "encourage" when referring to brownfield development. There is no basis in the NPPF for holding back greenfield sites on some assumed phased approach. Given the very high historic percentages of development on brownfield sites in Bradford from 2000 onwards and an array of issues associated with brownfield market delivery it will be difficult to achieve the brownfield targets in the early years of the plan period. We do not seek to reduce these local overall targets in any way insofar as they apply to the whole of the plan period nor do we wish to downgrade the significance of fully utilising brownfield sites wherever possible. However in order to maintain a deliverable five year land supply in Bradford a continuation of greenfield land release will be necessary year on year. Our extensive re-assessments of the deliverable five year land supply in Bradford, working with clients and other consultants demonstrates a continuing problem of achieving delivery over the last seven or eight years and even before this. The current five year supply has now been further reduced below 2.5 years.

As a supplement to our earlier evidence stated above it should be noted that in the second Call-in Inquiry of the Redrow / Bellway housing development proposals at Sty Lane, Micklethwaite, Bingley the Council and the developers agreed in a Statement of Common Ground that the five year supply was at best 2.05 years (October 2015)]

Consequently this approach is also unsound when tested against the fully comprehensive evidence base including these recent five year land assessments. This type of phased priority

approach has been a major contributor to the historic lack of a five year land supply in Bradford and the other districts of West Yorkshire. This has led to a series of appeals where in the great majority release has been supported on the basis of a poor level of deliverable supply.

The remaining second, third and fourth priorities are also lacking in justification and evidence based support. Not all greenfield opportunities are within the settlements as there remain some commitments in the form of greenfield allocations in the Replacement UDP which are yet to be implemented. It does not follow in sustainability terms that a greenfield opportunity within a settlement is more sustainable than a Green Belt release for an urban extension. Urban extensions of any scale, particularly those such as Holme Wood, which are in a lower priced market area and require significant infrastructure investment require a longer delivery period and their early release needs to be encouraged if they are to be realised within the plan period. Ranking urban extensions as a fourth priority has no evidential justification and the NPPF supports the early consideration and allocation of such proposals.

Other West Yorkshire authorities have now recognised the need for early release of strategic sites and other large sites which are identified as Green Belt releases and have included appropriate policy wording in their emerging draft allocation plans.

With regard to the need for and the timing of any Green Belt releases the NPPF has a general presumption in the core planning principles set out at paragraph 17 that the Green Belt around our urban areas will be protected. The Green Belt policy content of the NPPF in paragraphs 79 and 83 is that their key characteristics are their permanence and openness and that once established they should only be altered in exceptional circumstances. This process is addressed through the development plan preparation and Bradford Council have concluded that a significant percentage of Green Belt land will need to be released within the plan period. Given the five year land supply problems and the national guidance requiring the identification of specific developable sites or broad locations for years 6 to 10 of the plan period and where possible years 11- 15 also (paragraph 47 NPPF) it is quite possible in the Bradford context that Green Belt land releases will be justified in the earlier parts of the plan period and in some cases in the first five years in order to achieve a five year supply of housing land where the site location and conditions are capable of delivering a sustainable development outcome.

By definition in the Bradford context larger urban extensions are likely to be in the Green Belt, with the exception of a very small number of remaining safeguarded sites. There is therefore no logic in affording such extensions a fourth priority. The potential for some element of cross subsidy to inner area/ city centre sites is a further argument for early release of urban extensions though such an approach would be dependent on the removal of CIL charging.

The accessibility orientated approach contained in part B of this policy has no logical fit or justification in relation to the expressed part A priorities. While the criteria in part B with their accessibility orientated approach to site selection are supported they do not fit with this policy context nor are they the exclusive group of prime site selection criteria. In addition while the best use should be made of existing transport infrastructure and capacity the ability to make and fund future improvements is also a key consideration.

The whole of policy SC5 should be declared unsound and replaced by an appropriate/adapted site selection policy as it is not in conformity with the national policy approach and is not justified by the evidence base.

POLICY SC7 – GREEN BELT

MM17 and MM18

We welcome the additional wording within proposed main modifications MM17 and MM18 which provide clarity on the exceptional circumstances required to justify the need to review the Green Belt. However the modifications do not go far enough with regard to the need for a full comprehensive Green Belt review which we maintain is wholly appropriate. Our reasoning for a full, rather than selective, review of the Green Belt remains the same, as that put forward to the Core Strategy Examination. For convenience these are set out below.

Reasons for the need for a comprehensive Green Belt review:

- The scale and distribution of the housing and employment land requirements combined with the land take for supporting infrastructure.
- The policy advice at paragraph 85 of the Framework seeks to avoid a situation where Green Belt boundaries have to be reviewed again at the end of the current development plan period.
- The distribution of development to the settlement hierarchy layers identified in the CS and the relative lack of brownfield urban land within several of these settlements further supports the case for the comprehensive review. The housing needs of the populations in those sub markets which are geographically divorced from the main urban area of Bradford cannot realistically be provided for within urban Bradford and Shipley. Those seeking housing/re-housing are likely to preferentially look to relocate in adjacent areas, which may mean in adjacent districts, if adequate provision is not made in the sub market area where the need arises. If these needs are not met in this way the outcomes will not be sustainable.

The policy as worded seems to imply a two stage or two level process which would take longer than a comprehensive one stage review and would be less likely to lead to a balanced outcome. We consider that it is necessary to undertake a comprehensive Green Belt review as soon as possible and preferably as a precursor to the first detailed identification of potential land allocations. The process and methodology for the comprehensive review should be selected and incorporated into the CS as a clear strategic framework so that all participants in the process understand what is being done and how the policy constraint of Green Belt designation is to be treated and how it fits in the development location and site selection process as a sieve stage which is separate from environmental constraint criteria. The process of removing land from the Green Belt and the identification of new safeguarded land is a key strategic issue that should be thoroughly thought through with sufficient detail in the Core Strategy.

The issue of safeguarded land, as referenced in the above text, has not been addressed in the Core Strategy or in the Main Modifications, which we consider is a major failing of this most important part of the Bradford Development Plan. A full Green Belt review is required not just for the purposes of ensuring there is enough land to meet the housing requirement but also to include the removal of land from the Green Belt to designate as safeguarded land to meet development needs beyond the plan period. This will ensure that the new Green Belt boundary is capable of enduring well beyond the plan period and will remove the need for a further boundary review when preparing the replacement plan. It is generally held that once Green Belt boundaries have been thoroughly reviewed via an adopted development plan that they should be capable of enduring for a minimum of 20 years from the adoption date and desirably 25 years.

POLICY SC8 – SOUTH PENNINE MOORS SAC AND SPA AND JUSTIFYING TEXT.

MM19 – 37, MM48, MM53, MM58, MM131, MM132, MM147, MM148

We support all of the proposed main modifications in relation to Policy SC8 and to its justifying and explanatory paragraphs. However, from a purely pragmatic viewpoint, and in a bid to see an end Policy that is workable and understandable to all stakeholders in the allocations and planning application processes, we consider that some limited re-wording of the proposed modifications to the policy itself would be helpful. This would help to facilitate future negotiations and assessments in relation to specific development proposals.

MM19 to MM24

We support the modifications in full.

MM25

We support subject to the addition of the words “and taking into account achievable mitigation” after the words “including in–combination impacts”

MM26

We support the changes.

MM27

We think that the wording of the last sentence is not correct and too many words have been crossed out. We suggest the following re-wording for the modified text: “and those policies where direct impact pathways are identified such as in HO3 Housing Distribution and EN6 Energy.”

MM28 - The main policy text of SC8

We support the approach to the re-wording of this policy but request the following limited changes to improve clarity and future interpretation.

Final paragraph on page 20 of the modifications reword as follows:-

“Subject to the derogation tests of Article 6(4) of the Habitats Directive, development will not be permitted in any of the three zones identified above where it would be likely to lead, directly or indirectly, to an adverse effect upon the integrity of the SPA or SAC, either alone or in combination with other plans and projects, and where any such adverse effect cannot be effectively mitigated.”

Fourth sub para on page 21 we suggest the following re-wording:-

“In Zone B it will be necessary to consider whether, based on such evidence as may reasonably be required, including all relevant mitigation proposals, land proposed for development affects identified foraging habitat for qualifying species of the SPA. In this context suitable mitigation proposals will include the provision of replacement foraging habitat and/or the improved management of existing habitat.”

Zone C policy wording is supported.

MM48 - The additional proposed text to Sub Area Policy AD1 should be re-worded to the following (our suggested changes in bold and underlined)

“**mitigate or** avoid the loss of important foraging land within the SPA’s zoness of influence and to mitigate the impact of increasing visitor numbers.”

Additionally, reference should be made to the emerging SPD on the South Pennine Moors SAC and SPA, which should provide further guidance on mitigation measures.

SECTION 4: SUB AREA POLICIES

MM38 – MM52

The majority of the main modifications to the Sub-Area policies are a consequence of the modifications proposed to Policy HO3 in relation to the distribution of the housing requirement to individual settlements. Rather than repeating the same points in relation to the sub-area policies our comments are made to the proposed modifications to Policy HO3 in Section 5.

The written and oral evidence we provided for the Core Strategy EIP in March 2015 remain valid and appropriate at this stage.

SECTION 5.1: ECONOMY AND JOBS

MM65, 66 & 149

These proposed main modifications relate to changes to Policy EC2, with a reduction of the annual new jobs figure from 2,897 to 1,600. This is a projected jobs growth figure rather than an aspirational figure. We object to this significantly reduced figure within Policy EC2 and maintain our position that the job growth should broadly align with the Experian Economic Forecast (December 2014) of an annual job growth of 2,168. As stated in our Core Strategy Examination Statements, we agree with NLP that the aspirational target job growth of 2,897 resulting in a 0% unemployment rate is unrealistic. However, we consider that our conclusions remain valid that there are factors operating in Bradford which support a higher jobs growth total, a little way above the Experian projection of 2,168. The selection of an approximate mid-point between the high aspiration figure of 2,897 and the now proposed 1,600 is appropriate for the following reasons:

- This aligns with the expert evidence available
- The selection of a figure which has a significant but realistic degree of aspiration is necessary to achieve a better balance between homes and jobs and a higher level of containment in terms of commuting within the District. This will be an appropriate and sustainable outcome.
- The levels of educational achievement, aspiration and business start-ups in key cohorts of the BME population are a key job growth driver and an important component of the enhanced housing requirement we are advocating.

MM69

The reduced jobs growth figure has not resulted in a change to the planned requirement for employment land. We support and welcome the addition of the words 'at least' in relation to the 135ha employment land requirement. It is appropriate that this should be a minimum for the following reasons:

- The 135 ha is a gross supply figure and modern employment and business parks (the main but not the sole component of the required land supply) are 'land-hungry' and building to available site coverage rarely exceeds 40% and for high quality B1 office parks is circa 20%.
- It is important to have flexibility in the supply which should incorporate a variety of site sizes, types and locations.
- An additional employment land supply should be identified as part of the land to be safeguarded for residential and employment land requirements beyond the end of the plan period. This additional component should comprise at least 5 years supply. Assuming adoption in 2016 the annual supply equates to 9.64 hectares. Therefore the five year additional supply is $5 \times 9.64 = 48.2$ hectares.

We maintain our view that 10ha of employment land is required in Wharfedale as stated in our previous Examination statement, rather than only 5ha as currently proposed. This is fully justified by the evidence base and the needs of the market, and further justified by the increased housing figures proposed in Wharfedale. The distribution of the 135ha to City of Bradford; Airedale corridor and the Wharfedale corridor should also be referred to as 'at least' within Policy EC3 Criterion A.

SECTION 5.3: HOUSING

MM72, MM73

Policy HO1 – The District’s Housing Requirement

We object to the lack of changes to Policy HO1 and Table HO1 in terms of the overall housing requirement for the District. We maintain our position that the District housing requirement should be nearer 47,000 dwellings over the plan period as we stated at the Core Strategy Examination and in submissions to the Publication Draft Core Strategy. We therefore object to the retention of the overall housing requirement of 42,100. Our previous arguments were based on the demographic characteristics of the Bradford population, the need and the extent of proposed job growth and the housing market signals evident in the District.

When determining the scale of provision for new housing an FOAN should be based on the most up to date position (see paragraphs 158 and 159 of the Framework). Since the Examination closed in March 2014 significant evidence has emerged which further justifies our position that the housing requirement should in fact be 47,000 over the plan period. The latest ONS figures for the UK on net international immigration demonstrate, as expected by several consultants, that the number of in-migrants were considerably under-estimated in the year to March 2014 by 71,000 and in the year to March 2015 by 165,000 (a circa 100% increase). This has a significant impact on the number of households needing to be housed in Bradford across the plan-period to 2028. It is not possible to assess with any precision the extent of that impact over the remaining 14 years of the plan period as we do not know how many of the immigrants coming into Bradford will join existing households and how quickly they might form new households and also we do not know how long this heightened trend of net immigration will continue. That said, Bradford is one of those authorities where net international immigration is most likely to be above the national average rate due to the existence of strong ethnic communities and existing family ties. It is considered these figures lend considerable support to the higher housing need figure of 47,000 which we are advocating on behalf of our clients. Our recommended distribution of 47,000 is set out in response to the main modifications to Policy HO3.

Evidence on the latest immigration statistics justifying an increased housing requirement was put forward to the second Sty Lane, Micklethwaite, Bingley Call-in Inquiry.

MM75 – 88

POLICY HO3 – DISTRIBUTION OF HOUSING DEVELOPMENT

The objections to the lack of increase in the housing requirement in Policy HO1 are also relevant to the changes to Policy HO3 and the distribution of housing development.

The table below reveals the differences between the Draft Core Strategy and the Main Modifications alongside our proposed alternative distribution with a higher overall requirement. Text in red reflects the proposed main modifications.

	Draft Core Strategy	Proposed Main Modifications	Proposed Alternative
Bradford District	42,100	42,100	46,850
Regional City of Bradford	28,650	27,750	28,650
Bradford City Centre	3,500	3,500	3,500
Canal Road	3,200	3,100	3,200
Shipley	1,250	750	1,250
Bradford South East	6,000	6,000	6,000
Bradford North East	4,700	4,400	4,700
Bradford South West	5,500	5,500	5,500
Bradford North West	4,500	4,500	4,500
The Principal Towns	6,700	6,900	7,850
Ilkley	800	1,000	1,250
Keighley	4,500	4,500	5,000
Bingley	1,400	1,400	1,600
Local Growth Centres	3,400	4,900	6,550
Queensbury	1,000	1,000	1,300
Silsden	1,000	1,200	1,650
Steeton with Eastburn	700	700	1,150
Thornton	700	700	1,150
Burley in Wharfedale	----	700	700
Menston	----	600	600
Local Service Centres	3,350	2,550	3,800
Addingham	200	200	275
Baildon	450	350	600
Burley in Wharfedale	200	----	
Cottingley	200	200	275
Cullingworth	350	350	500
Denholme	350	350	500
East Morton	100	100	150
Harden	100	100	150
Haworth	500	400	650
Menston	400	----	
Oakworth	200	200	275
Oxenhope	100	100	150
Wilsden	200	200	275

Ilkley: We object to the limited increase proposed for the housing requirement distributed to Ilkley. Based on our detailed work in the area to date and to support the full housing needs of the town and the full realisation of its Principal Town status [see various vision statements and strategic objective 1,

policy SC1 (5), SC4 Principal Towns A & B) we advocate a housing requirement of 1,250 units. MM88 makes reference in the reason for the modification to the Ilkley target being adjusted largely as a result of the revised HRA. The HRA should not be the sole reason for the Ilkley adjustment. The Principal Town status, with its many strengths and the policy support referred to above are also a reason for increasing the housing requirement. The 1,250 units should be expressed as a minimum with a need to add an appropriate percentage for reserved land which is removed from the Green Belt to ensure that the Green Belt boundaries when amended are then capable of enduring unchanged for at least 20 years from plan adoption.

Bingley: We advocate a higher housing requirement. We conclude that there is specific and sufficient evidence to support the growth of Bingley and we advocate a higher housing requirement figure of 1,600. Bingley and its environs are a main centre of existing employment and further employment land provision needs to be made on smaller sites within the urban fabric and on larger well planned employment parks in the wider locality at the heart of Airedale. Housing development is needed as essential infrastructure to support economic growth and to provide funding contributions for new and enhanced social and environmental infrastructure. The early delivery of the main remaining phase 2 UDP housing allocation (capacity circa 440 dwellings) to the west of the town, which is well integrated with the urban form and well placed for key transport connections is essential in the very short term to reduce the backlog in housing provision and to enhance housing supply in the context of a five year deliverable supply of at best 2.05 years.

Queensbury: We recommend the requirement in Queensbury is increased from 1,000 to 1,300. This is still below the 1,500 suggested requirement in the Further Engagement Draft Core Strategy. There is a very good range of existing community and social facilities and services in Queensbury. Carefully planned new housing development in this location may make a contribution to the investment needed to address shortfalls in education provision and further enhance public transport services. New homes would also support existing businesses and the local centre expansion as well as address the identified housing need and demand in the area

Steeton with Eastburn: We advocate the increase in the housing requirement to 1,150 units. This Local Growth Centre is located in a strong position in the Airedale Corridor and benefits from excellent communications. It also has significant potential to contribute to economic growth in the form of new housing and employment developments. The relatively high level of local job provision presents a key opportunity to reduce journey to work lengths and support other key policy objectives by providing the level of supporting housing infrastructure we propose.

Menston: We support the proposed increase of the requirement in Menston to 600 units. A higher reasonable level of development is capable of being sustainably accommodated together with a small reserve land component with limited further Green Belt releases.

Addingham: Addingham can and should accommodate circa 275 dwellings plus a reserve land component. We conclude that there is more than sufficient land in sustainable Green Belt releases, some of which are small in scale, and small developments within the urban area to meet a distributed housing requirement of 275 dwellings. This level of housing growth can be supported by the services which already exist and in turn this level of development will add further support for the retention and in some cases the expansion of those services. Green Belt releases proposed in Addingham do not adversely impact on 4 of the 5 main functions and purposes of Green Belt designation. The only argument which can be applied is the retention of open countryside. A positive planned approach will ensure retention of key sectors of open countryside which are important to the setting and character of the village.

Baildon: We object to the proposed reduction to the requirement in Baildon and advocate an increase to 600 units. Carefully planned development will ensure existing community facilities, services and businesses continue to be supported. This level of development can be accommodated while preserving the key elements of the setting of the World Heritage site of Saltaire.

Cottingley: We advocate an increase to the housing requirement from 200 to 275. This proportionate increase reflects our recommended increase to the overall housing requirement.

Denholme: We recommend the increase in the requirement to 500 units. This proportionate increase reflects our recommended increase to the overall housing requirement.

POLICY HO4 – PHASING THE RELEASE OF HOUSING SITES

MM89

MM91 Policy HO4 – Additional criteria added:

Our objections put forward at the Examination (Matter 7B) remain valid in relation to Policy HO4. The proposed additions of Criterion D and E to this policy, whilst being welcome additions do not address our overriding objections.

We recommend that the Council's suggested choice of year 8 (2022/23) of the plan period as the main release trigger is too late in the process and consider the second phase of sites should be released in year 5 of the plan period (2019/20).

It is worth pointing out that we are coming towards the end of year 1 of the 15 year plan period and the eventual adoption of the Core Strategy is likely to be within year 2 (2016/17). Given the Allocations DPD is at the very early stages, it is likely that this will be adopted well into the 15 year plan period (estimated adoption late 2018, which is towards the end of year 4 of the plan period).

In addition there needs to be a clear trigger mechanism to ensure a rolling 5 year housing land supply is achievable for releasing phase 2 sites.

The addition of Criterion D is welcomed, which allows for bringing forward certain sites which will have a long gestation and delivery periods, which necessitates their early release. However, there is a lack of detail as to what 'large or complex sites' are and further clarification would be welcomed.

There is no definition of 'persistent shortfall' in Criterion E other than in the changes to paragraph 5.3.77 (MM92) which refers to it being defined as "being over 2 successive monitoring year periods", however there is no definition of what constitutes a shortfall.

Should the Council continue with two phases of housing sites, we suggest a trigger mechanism whereby if the Council have failed to deliver 80% of the housing requirement for the previous 2 years then that should automatically trigger the release of the next phase of allocations.

POLICY HO4 – JUSTIFYING TEXT

MM92

MM152 Appendix 6

5.3.75 "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."

We welcome this addition, however recommend that, given the track record in Bradford of persistent under delivery, it is important not to place all the best sites into Phase 2.

5.3.76 – "The council recognises that in some cases there will be relatively long lead in times and technical issues associated with bringing forward larger or more complex sites for residential development. In such cases early release and phasing may assist infrastructure

planning and the securing of funding, and will also ensure that such larger sites are capable of delivering their completions in full within the plan period. Consideration will be given to opportunities to bring such sites forward for development, as part of the first phase, where this is appropriate and consistent with the overall strategy.”

We welcome this additional paragraph which provides further detail to the additional criterion D of Policy HO4.

The need for the word ‘unlikely’ is unnecessary in the additional text of paragraph 5.3.77. “The Council will also consider the early release of phase 2 sites in the *unlikely* event of a persistent shortfall...”

In relation to Appendix 6 which is referenced in 5.3.77, this should be referred to as an indicative housing delivery trajectory.

We welcome the 20% buffer reference in paragraph 5.3.77, however object to the Council’s approach to resolving backlog over the full plan period, and advocate the use of the Sedgefield method is more appropriate for resolving the backlog in the first five years. The application of the Sedgefield method is in line with National Planning Practice Guidance paragraph 35 (ref: ID-3-036-20140306) which states:

“Local Planning authorities should aim to deal with undersupply within the first 5 years of the plan period where possible”.

POLICY HO5 – DENSITY OF HOUSING SCHEMES

MM93

We welcome the addition of reference to ‘most’ developments rather than ‘all’ developments achieving a minimum density of 30 dwellings per hectare. We do however maintain our view that the target of 90% of units on completed housing schemes to be at a minimum of 30 dph is unrealistic and unachievable and suggest this target is reduced. It would be helpful if additional text were added to the justifying text to Policy HO5 explaining where a lower density of less than 30 dph is acceptable. Bradford has a number of localities where topographical constraints on their own, or in combination with other constraints, limit the overall net site density which can be achieved

POLICY HO6 – MAXIMISING THE USE OF PREVIOUSLY DEVELOPED LAND

MM96 – 98

The proposed main modifications to this Policy fail to address our previous overriding comments that reference to prioritising brownfield sites is contrary to the NPPF which states that brownfield development should be encouraged. Notwithstanding this point, we welcome the deletion of the brownfield targets being 'minimum'. These targets, to restate our previous comments, should be used as a guideline and not a punitive policy instrument.

POLICY HO9 – HOUSING QUALITY

MM100 – 107

Whilst comments were not made to this policy in previous submissions or at the Examination, we align ourselves with the HBF response to this matter.

POLICY HO11 – AFFORDABLE HOUSING

MM108 AND 109

We have no objections to the proposed modifications to Policy HO11 and the supporting paragraphs. We support the thresholds “developments of 15 units or more and 5 units or more in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley) and the proportions (up to 30% in Wharfedale; up to 20% in towns, suburbs and villages; and up to 15% in inner Bradford and Keighley), given they are maxima and subject to viability testing.

We trust that the above comments will be given due consideration and look forward to receiving notification of the publication of the Inspector's Report.