Section 5: Thematic Policies

Planning for People 5.3 **Housing**

This section includes policies which seek to ensure the delivery of housing to meet the District's needs, including:

- The District's Housing Requirement
- Strategic Sources of Supply
- Housing Distribution
- Managing Housing Delivery in a Sustainable Way
- Housing Mix and Quality
- Affordable Housing
- **Gypsies**, Travellers and Travelling Showpeople.



Introduction

- 5.3.1 In terms of population and housing Bradford is changing rapidly. One of the biggest challenges facing the District in the period up to 2030 is how to accommodate a rapidly growing population whilst also responding to the effects of significant changes in its social and demographic profile. This section of the Core Strategy will set out both policies and principles to facilitate and deliver sustainable housing growth and ensure that housing providers in all sectors provide the type and quality of new homes which will meet the needs and aspirations of its existing and future population. Taken together the policies here and in this rest of this document must help to ensure that housing growth stimulates and supports regeneration and prosperity in the District, while helping deliver successful places at all scales ranging from the sub areas, towns and villages outlined in Section 4, to the creation at a more local level of successful neighbourhoods through high quality and inclusive design.
- 5.3.2 This means that growth must be part of a program which continues to secure the regeneration of the District's urban areas, and which, while recognising the need for development in some green field and Green Belt locations, still has at its heart the over arching principles of making best and most efficient use of urban and previously developed land and protecting the District's best and most valued green infrastructure, spaces and habitats.
- 5.3.3 The intention is that the policies and approach of this section compliments, supports and delivers the Vision and key Objectives of the emerging Housing and Homelessness Strategy for Bradford as outlined below:

Our Vision:

"Everyone in Bradford District should have a place to call home which is suitable for their needs and in which they can thrive."

KEY OBJECTIVES

MORE HOMES - Build sufficient new homes to meet the needs of a growing population. New homes of the right type in the right location. Make better use of existing housing to meet growth needs by bringing empty homes back into use. Make sure there is the appropriate infrastructure to support housing growth.

SAFE & HEALTHY HOMES - Ensure all housing is free from the worst hazards. Make sure homes support people to stay healthy. Adapt homes so people can stay independent. Encourage all landlords and lettings agents to provide safe and healthy homes with decent management of tenancies. Tackle the blight of empty homes.

AFFORDABLE HOMES - Ensure an adequate supply of affordable homes to buy or rent that match household incomes. Enable people to affordably heat and sustain their homes by helping them make their homes more efficient.

SUPPORT INDEPENDENCE & PREVENT HOMELESSNESS - Provide support and advice to help people to live independently and prevent homelessness. Raise aspirations and remove the barriers to employment so households can sustain their housing independence. *Source : Draft Bradford District Housing and Homelessness Strategy 2014*

- 5.3.4 The policies of this section have also been formulated to be consistent with national planning guidance, most notably the National Planning Policy Framework (NPPF) and to reflect the Vision set out in Section 3 of this document and it's emphasis on increasing housing delivery, and supporting the growth and economic transformation of the District.
- 5.3.5 Figure HO1 below outlines the 10 principles which will underpin the housing policies of both this Core Strategy and all subsequent DPD's within Bradford's Local Plan:

Figure HO1: 10 Principles for Achieving Sustainable Housing Growth

- 1. Distributing housing growth in a way which reflects accessibility to jobs and services and supports the role of Bradford as a Regional City, and Keighley, Ilkley and Bingley as Principal Towns;
- 2. Prioritising, wherever possible, the use and recycling of previously developed land and buildings and fully exploring the opportunities for housing growth to lever investment into the remodelling and environmental improvement of existing urban areas;
- 3. Making most efficient use of land, recognising that it is a scarce resource, and thus setting challenging but achievable density targets for developers to adhere to;
- 4. Phasing the release of land to ensure that housing growth is coordinated with planned infrastructure provision and to encourage the take up of brownfield land in the most sustainable locations while ensuring delivery of housing targets in line with a published housing trajectory;
- 5. Ensuring that development provides an appropriate mix of housing to fulfil the needs and aspirations of the District's current and future populations, improving housing choice and supporting healthy and balanced local housing markets and diverse and cohesive communities;
- 6. Ensuring that housing development meets high standards of construction and design, including the incorporation of low carbon technologies and renewable energy generation, wherever feasible and viable;
- 7. Making adequate provision for affordable housing and ensuring that that housing is of the size, type and tenure to address the most pressing needs for those who cannot access market housing;
- 8. Acting to maintain and improve the existing housing stock addressing in particular the issues of over crowding;
- 9. Using the powers and resources available to reduce the number of empty homes, in particular long term vacant properties;
- 10. Setting out broad principles for the identification and allocation of specific housing sites within the Local Plan so that individual site related choices support and do not undermine the Core Policies of this document.

5.3.6

The key evidence which has underpinned this section of the Core Strategy and which will be outlined in more detail below includes:

- The Bradford District Housing Requirement Study (February 2013) Addendum Report (August 2013) and Updated Demographic Analysis & Forecasts September 2014
- The Bradford District Strategic Housing Market Assessment (SHMA) 2010 and SHMA Update 2013
- The Bradford District Strategic Housing Land Availability Assessment (SHLAA) October 2011 and SHLAA Update May 2013
- The Bradford District Affordable Housing Economic Viability Assessment (AHEVA) 2011 and The Local Plan Viability Assessment 2013 and Update (December 2014).

The District's Housing Requirement

- 5.3.7 The Government, in its National Planning Policy Framework (NPPF), has outlined its objective to boost significantly the supply of new housing in response to a growing population and to support sustainable economic growth. The NPPF states that planning has a key role to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.
- 5.3.8 One of the key roles of the Core Strategy is therefore to assess and then set out the number of new homes which will need to be planned for to meet the needs of the District's current and future population and thus support the local economy.
- 5.3.9 The provision of sufficient new homes of the right quality will provide both direct and indirect benefits to the District's economy and is key to achieving the Core Strategy's vision and Objectives. Without sufficient new homes for its growing population, the District will be unable to retain its growing labour force, will be unable to attract the inward investors necessary to support jobs growth and will therefore be unable to achieve its aims of regeneration and economic transformation. Furthermore, the Council in it's Housing and Homelessness Strategy, considers access to good quality housing to be a key requisite for improving the life prospects, in particular in health and educational attainment.
- 5.3.10 At a more practical level, determining the housing requirement is critical to the Core Strategy since it feeds directly into the spatial strategy by determining how much land is needed for new housing development.
- 5.3.11 Determining the scale of provision for new housing to plan for within this Core Strategy has involved two key stages. Firstly, in line with the NPPF, the Council has sought to undertake an objective assessment of the future need for new housing using robust and up to date evidence. It has then considered whether it is feasible and appropriate to plan for this level of housing growth bearing in mind such factors as deliverability, land supply, environmental impacts and the need for a Green Belt review.
- 5.3.12 The level of new housing required is difficult to assess because it is dependent on a range of complex and interdependent variables all of which have to be projected forward over

the period of the Plan. The Council has therefore sought independent advice on the level at which the housing requirement should be set by the commissioning of a Housing Requirement Study. The results of the Housing Requirement Study have then been incorporated into the SHMA update. The study looks at:

- Official Government projections of expected population and household growth in the District;
- The sensitivity of population and household growth to variables such as levels of migration;
- The influence of projected economic and jobs growth on the number of new homes needed; and
- Housing market indicators and drivers.
- 5.3.13 The population and household projections formulated by the Government and the Office For National Statistics are trend based and therefore highly sensitive to the trend period on which they are based. They are updated on a regular cyclical basis approximately every two years. The initial Housing Requirements Study was issued in February 2013 and was based on the then current 2008 based household projections. It was then supplemented by an addendum report which re-ran the modelling to incorporate the interim 2011 based household projections issued by the CLG in April 2013. A further report was issued in September 2014. This update was commissioned as a result of work with neighbouring authorities within the Leeds City Region aimed at deriving a consistent approach to assessing housing need. The new work updated the core demographic and economic based scenarios of the earlier reports using recently released 2011 census data, updated jobs growth projections and the newly issued 2012 based population projections.
- 5.3.14 Full details of the Housing Requirements Study and the different iterations of the work are available on the Council's website. In line with Government guidance, in each case the work generated a baseline demographic scenario. However, one of the key conclusions of the work is that the District is expected to see rapid and sustained population growth over the period and that the housing requirement should be aligned to a level of household growth consistent with the expected expansion in the District's economy as indicated by the Regional Econometric Model. The result is an increase or uplift in the assessment of housing need to a level well above the basic demographic scenario.
- 5.3.15 In line with the NPPG the Council has also taken account of a range of market signals in its objective assessment of housing need. It has reflected on the information and analysis contained both within the Housing Requirement Study and the SHMA. The Government identifies a number potentially relevant market signals but in Bradford's case the most significant are considered to be past rates of development and overcrowding. Past rates of development have been significantly below both planned supply and below the average rate of household growth over the period. Levels of overcrowding within parts of the urban areas are high and have worsened in recent years. The Council considers that this indicates a level of unmet need which it has addressed via the addition of a further uplift to the housing need assessment.
- 5.3.16 Having determined its objective assessment of need the Council has given careful consideration to whether that need can and should be met within Bradford District. Having regard to evidence such as the SHLAA the Council considers that the level of need can be accommodated and delivered. It has also used a range of evidence including the Bradford

Growth Assessment and the Sustainability Appraisal to consider the implications of planning for this level of growth. In particular it has given careful consideration to the need for and implications of Green Belt changes. It considers that the District's housing needs can be met in full in a sustainable way and in accordance with the NPPF.

Policy HO1: The District's Housing Requirement

A. Provision will be made within the Local Plan to facilitate the scale of new housing development as set out in Table HO1.

B. After allowing for net completions over the period 2004-13 and an allowance for the projected reduction in the number of vacant homes, the Local Plan will allocate land to meet the remaining requirement for at least 42,100 homes over the period 2013 to 2030;

C. Forthcoming DPD's will assess the projected losses to the existing housing stock from clearance and change of use and increase the level of allocations to compensate accordingly.

OUTCOMES	INDICATORS	TARGETS
The need for housing in district resulting from increases in population and households has been met.	On an annual basis: Additions to the dwelling stock via housing completions Corporate IND5(H)	Achieving the total housing requirement of 42,100 new dwellings over the period to 2030 mindful of the net annual completion rate of 2200 dwellings as set out in Table HO1.
	Losses due to demolition, clearance and conversion to non residential use. Operational	
	Total number of vacant homes (long term and short term); Operational	
	Vacant homes brought back into use Operational	
	Monitoring delivery against the Local Plan housing trajectory. IND5(H) IND7(H)	

LEAD ROLES	DELIVERY MECHANISMS
CBMDC	Strategic Policy via Local Plan Core Strategy
Bradford Housing	Land Allocations in the Local Plan
Partnership	AMR
Developers – market housing	Bradford Housing & Homelessness Strategy
RSL's – social housing	Local Investment Plan
	BMDC led Neighbourhood Action Plans
HCA	Community Led Neighbourhood Plans
Leeds City Region	Community Lea Neighbourhood Flans
Government	

Table HO1: Bradford District Housing Requirement

BRA	DFORD DISTRICT HOUSING REQUIREMENT	2004 to 2030		
А	Statutory Development Plan Housing Requirement 2004 - 8	(1560 x 4)	=	6,240
В	Statutory Development Plan Housing Requirement 2008 - 11	(2700 x 3)	=	8,100
С	Housing Requirement Study Based Housing Requirement 2011 - 13	2200 x 2	=	4,400
D	Total Housing Requirement 2004 - 13	A + B + C	=	18,740
Е	Net Completions 2004 - 13	(From AMR)	=	11,053
F	Residual unmet Need 2004 - 13	D - E	=	7,687
G	Housing Requirement Study Based Housing Requirement 2013 - 30	2200 x 17	=	37,400
н	Total Housing Requirement 2004 - 30	D + G		56,140
PROVISION TO BE MADE IN THE LOCAL PLAN FOR THE PERIOD 2013 to 30				
I	Net Completions 2004 - 13		=	11,053
J	J Allowance for Reduction in Vacant Homes		=	3000
K	Remaining Requirement To Be Met By Housing Site Allocations	H - I - J	=	42,087

- 5.3.17 As set out in Policy HO1 and Table HO1 there are a number of key variables which combine to produce the housing requirement for the district.
- 5.3.18 The Housing Requirement Study's base date is 2011 and sets out its analysis of household growth and housing need up to 2030. The Core Strategy therefore indicates an estimated annual need over that period of 2200 dwellings in line with the report's recommendations.
- 5.3.19 The Government also requires that the Housing Requirement includes an allowance for any unmet need or under supply over the period preceding the new plan. Table HO1 of the Core Strategy therefore includes an assessment of net completions compared to housing targets over the period 2004-11. When completions over 2011-13 are factored in there has been an overall under supply of 7,687 dwellings over the period. This is corroborated by the fact that household growth over this period has far exceeded the number of dwellings provided and this has been one of the factors in the growing demand for social housing and significant problems of over crowding in parts of the District. This under supply figure has therefore been added to the requirement.
- 5.3.20 Housing requirements are normally expressed as net requirements i.e. indicating the overall increase in the housing stock needed to meet household growth over the plan period. The level of new homes actually provided has to be adjusted to reflect the expected balance between existing homes lost through demolition, or change of use and the contribution which is expected to be made by reducing the number of vacant homes.
- 5.3.21 While the Council has both reasonable data on vacant properties and a firm strategy and action plan for reduction in vacant homes there is considerably more uncertainty over the likely future levels of clearance. Clearance levels depend to a large extent on the programmes and strategies of social housing providers and the availability of finance to fund these programmes. Despite requests for information, the consultants on the Housing Requirement Study received very little response from Registered Social Landlord's (RSLs) on their expectations regarding future clearance, perhaps in part in reflection of the continued uncertainty over future public sector funding.
- 5.3.22 While Policy HO1 includes an allowance for the expected reduction in vacant homes it does not therefore include a specific estimate of future losses to the existing stock. It is considered that this is best assessed at the time that site allocations are made on a sub area basis when more definitive information may be available. The policy does however make it clear that the Local Plan allocations will need to make additional provision to cover expected losses to the existing dwelling stock.
- 5.3.23 As a result of these calculations and variables, Policy HO1 requires that provision is made for at least 42,100 new homes over the period to 2013 to 2030 in addition to those already completed in the preceding period.

Strategic Sources of Supply

Introduction

- 5.3.24 Having assessed and set out the scale of housing required to meet need over the plan period it is also important to indicate in very broad terms how this requirement will be met. Policy HO2 therefore describes the main sources of supply, the balance between existing and known sites and new sites which will need to be identified within the Local Plan, the areas which will see particularly significant housing growth, area based initiatives which are planned or underway to deliver growth and an indication of the need for Green Belt to meet the housing requirement. It therefore sets out, as required by paragraph 156 of the NPPF, the strategic priorities for the area as far as they apply to meeting housing need.
- 5..3.25 The approach set out within Policy HO2 reflects the scale and distribution of deliverable and developable land within the SHLAA and the Strategic Objectives of this Core Strategy, in particular Objectives 1,2 and 5. It also reflects the Council's key regeneration priorities and programmes in particular those which are geared towards delivering the regeneration of Bradford City Centre, the development of the Canal Road Corridor, and comprehensive regeneration and investment in and adjoining Holme Wood.
- 5.3.26 The housing requirement set out within Policy HO1 has already taken account of housing completions up to April 2013. In addition to any further completions after this date on sites with a capacity of 5 or more dwellings or above 0.2ha in size, the main sources of supply to meet the housing requirement are now explained in more detail.

Existing Sites and Unimplemented Allocations

- 5.3.27 April 2012 data indicates that 14,562 homes could in theory be delivered by known supply with planning status. This comprises:
 - sites with planning permission for residential development totalling 9,627 units these comprise both sites allocated for housing development within the RUDP and other planning permissions windfall proposals which have come forward such as mill conversions and city centre flats;
 - existing and as yet unimplemented sites allocated for housing development within the RUDP and which have yet to see planning permission granted. These sites are estimated to have a total capacity of 4,935.
- 5.3.28 The AMR reports the overall and theoretical capacity of these sites. The SHLAA, however, gives a more accurate picture since it has assessed all potential sources of sites, not just those with some form of planning status, and has assessed the deliverable and developable capacity of each site.
- 5..3.29 Table HO2 overleaf therefore contains two sections, one which sets out the known supply based purely on the Council's AMR / monitoring systems and the second which shows the known and potential supply as analysed and revealed by the SHLAA completed in May 2013.

Table HO2: Analysis of Potential	Land Supply (AMR and SHLAA)
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PLANNING COMMITMENTS (AMR APRIL 2013)	
Dwellings with Planning Permission	
Previously Developed Land	6,501
Conversion / Change of Use	1,053
Greenfield	2,073
TOTAL	9,627
Dwellings on Unimplemented Former RUDP Allocated Housing Sites	
Previously Developed Land	1,044
Greenfield	3,891
TOTAL	4,935

SHLAA SUMMARY (Deliverable or Developable Sites)	
Phasing Break Down	
Short term deliverable	8,554
Medium term developable	27,432
Long Term Developable	13,872
Residual Developable	3,850
Constraints Breakdown	
Suitable Now	19,493
Policy Constraints*	33,237
of which safeguarded land element	4,607
of which green belt element	19,000
Physical Constraints	978
PDL / Green Field	
PDL	18,067
Green Field	35,641
TOTAL SHLAA POTENTIAL	53,708

*This figure includes all sites affected by some form of current Planning policy constraint ranging from group TPO's to green belt.

The Scale of New Allocations Needed

- 5.3.30 The AMR and the SHLAA 'Suitable Now' category give an indication of the level of supply which is deliverable without the need for new Local Plan allocations. Even if all of this supply was implemented it would still only meet approximately 46% of the total district wide housing requirement of 42,100 (figure based on SHLAA 'suitable now' subset).
- 5.3.31 This means that more than half of the new homes required over the plan period will need to come from new site allocations which will be brought forward via the Allocations DPD and the two Area Action Plan DPD's for the City Centre and Shipley & Canal Road Corridor. Some of these new allocations will need to come from land on the edge of towns and villages identified as safeguarded land in the RUDP. These were sites which had been assessed as broadly suitable for development in the longer term beyond the then plan period to 2014 and which would help avoid or minimise the need for future change to the Green Belt. Given the scale of population growth now apparent, it is likely that most if not all of this land source will be required to meet need over the plan period to 2030. The SHLAA estimates that those safeguarded land sites currently assessed as deliverable or developable could make a contribution of just over 4,600 dwellings. Taken together, the safeguarded land and SHLAA 'suitable now' sites could generate around 24,100 new homes in the plan period, however this still only equates to around 57% of the district wide requirement.

The Need for Change to Green Belt to Meet Housing Needs

- 5.3.32 The SHLAA results illustrate in a number of ways the challenges facing the District in meeting the overall housing target. Although the total deliverable and developable quantum lies well above the district wide housing requirement, this is only because of the contribution made from sites which are subject to a range of current policy constraints including Green Belt. Because of the enormity of the scale of new housing required and the already evident shortfall in supply it was not possible for the SHLAA to assess the suitability of sites based on a 'All Policies Switched On' basis. The compromise approach was therefore to discount only those sites where national policy would be reasonably unequivocal that development could not place such as in areas of international wildlife importance or highest risk of flooding. Local policies were therefore 'switched off' as part of the SHLAA process. Of the total SHLAA supply of just under 54,000, sites with a total capacity of around 33,000 are affected by some form of current policy constraints. However in many cases only part of a site area is affected by such constraints and in other cases the constraints concerned, such as TPO's and conservation areas, are ones which would affect the form and layout of development rather than its acceptability in principle.
- 5..3.33 Of the SHLAA 'policy constrained' capacity of 33,000 approximately 19,000 lie within the currently designated Green Belt. Even if all of the land with non-green belt policy constraints were allocated (which is unlikely as at least some when subject to more detailed analysis is likely to be retained for its environmental and amenity value) a very substantial Green Belt contribution would be required to meet the district wide housing requirement. Based on the assumption that the contribution from sites affected by non Green Belt policy constraints is discounted by around a third the Council estimates that Green Belt releases of land for around 11,000 dwellings will be needed to meet the housing need of the District.
- 5.3.34 As part of the process of producing the Allocations DPD the Council will engage with all stakeholders in assessing the range of development site options which are considered

achievable and will continue to search for alternatives which would avoid or reduce Green Belt release. Policy HO7 includes a commitment to minimise the release of Green Belt in line with the principles set out in the NPPF. However based on the land supply constraints identified above it is likely that Green Belt releases, though focused heavily on the main urban areas, will also be needed in many of the smaller settlements across the District.

Area Based Initiatives and Growth Areas

- 5.3.35 In order to address the scale of this challenge in finding new and additional sources of supply the Council is undertaking a number of area based initiatives. These are listed within Policy HO2. These area initiatives will result in housing growth of a scale well in excess of that which might be expected based on the existing size of the their populations.
- 5.3.36 The Council are currently progressing the development of two Area Action Plan DPD's which will make a significant contribution to meeting housing need, secure regeneration and reduce the need for land in green field and Green Belt locations. These are the Shipley and Canal Road Corridor AAP which involves comprehensive urban change incorporating new road and community infrastructure and relocation of existing uses and which is being delivered by the Council and partners in the form of a Joint Venture Company, and Bradford City Centre where regeneration and investment is expected to stimulate further residential development.
- 5.3.37 Within the NPPF the Government has acknowledged that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns. Another of the area based initiatives geared at delivering housing growth that at Holme Wood is a case in point. Here comprehensive proposals involving both the more efficient use of existing land by remodelling existing areas of underused land, and linking built and open spaces more successfully have been combined with proposals for an urban extension. The combination of these proposals will secure significant funding for the improvement of the existing urban area. These proposals have been progressed via the production of a local neighbourhood plan led by the Council in partnership with local members and stakeholders.
- 5.3.38 The timing in which these initiatives will bring forward new development opportunities will vary with parts of the Canal Road area and the Holme Wood urban extension contributing most during the second half of the plan period.
- 5.3.39 Other growth areas identified within Policy HO2 which will be delivered via the production of the Allocations DPD include Queensbury, Thornton, Silsden and Steeton with Eastburn. Development here is envisaged to be of a much smaller scale but still significant in relation to the existing size of these settlements. Queensbury and Thornton have been identified on the basis of their current and potential land supply and their status as accessible locations close to the Regional City and in the third tier of the settlement hierarchy. Silsden and Steeton also have potential and will help provide for housing need at the western part of the District and to a degree will help draw development away from areas such as Keighley and Haworth whose surrounds are constrained by landscape and topography.

Summary of Land supply

5..3.40 Subject to further more detailed site assessments as part of the other DPD's and future SHLAA updates, key elements of the supply are as follows (Note the categories below are not mutually exclusive):

- Around 19,500 from sites considered by the SHLAA as 'suitable now';
- Around 3,200 from the Canal Road Corridor AAP area;
- Around 3,500 from the Bradford City Centre AAP area;
- Around 4,600 from areas of RUDP designated safeguarded land;
- Around 6,000 houses in the Bradford SE growth area including an urban extension at Holme Wood; and
- Up to 11,000 from Green Belt (this includes local green belt releases together with the urban extension at Holme Wood), the majority of which will be in the higher order settlements and which will be focused particularly on the Regional City.

Policy HO2: Strategic Sources of Housing Supply

- A. The dwelling targets set out in Policy HO1 will be met through:
- 1. Housing completions since April 2004 and
- 2. Existing commitments with planning permission and
- 3. Unimplemented but deliverable or developable sites allocated for residential development in the RUDP
- 4. Safeguarded land sites identified in the RUDP
- 5. Additional new deliverable and developable sites allocated for housing development within the forthcoming Local Plan Development Plan Documents :
 - the Allocations DPD
 - the Bradford City Centre AAP
 - the Shipley & Canal Road AAP and
 - Local Neighbourhood Plans.
- B. Specific area based initiatives to help deliver the supply targets will include:
- 1. Growth areas as follows:
 - i) The development of an Urban Eco Settlement in the Shipley and Canal Road Corridor
 - ii) Bradford City Centre
 - iii) SE Bradford, and
 - iv) Queensbury, Thornton , Silsden and Steeton With Eastburn.
- 2. An urban extension at Holme Wood;
- 3. Local Green Belt releases where consistent with the Plan's sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area.

OUTCOMES	INDICATORS	TARGETS
	Process policy, no indicators	

5.3.41 Policy HO2 should be read alongside Policy HO3 which indicates the geographical apportionment between areas, the targets for the balance between green field land and previously developed land (Policy HO6), and the area based initiatives which will be needed for delivery. Many of these elements are brought together in the Housing Implementation Framework which is included in Appendix 6.

Distribution of Housing Development and DPD Targets

Introduction

- 5.3.42 One of the key goals of this Core Strategy is to provide a reasonable level of certainty over the scale and distribution of new development within the different parts of the District over the plan period in particular to set the framework within which the site allocating DPD's will be prepared. Policy HO3 therefore indicates how the housing requirement will be split between these strategic planning areas and for the purposes of planning at the local and neighbourhood level, how many homes each of the different settlements of the District will need to be provided for.
- 5.3.43 While it is important that the distribution is aligned in general terms to the areas of expected and greatest need, and to the areas where household growth is expected to be greatest, it is not possible or strategically desirable to use this as the sole means of determining housing targets. This is for the simple reason that distribution of deliverable and developable land supply and the geographical occurrence of significant environmental constraints does not necessarily match or reflect this ideal. Having said that the distribution set out in Policy HO3 is heavily focused on the larger urban areas and settlements within the District.
- 5.3.44 In the remainder of this section the key principles underpinning the settlement distribution are set out.
 - Firstly the general principles which have underpinned all of the work are outlined;
 - Secondly the production of a baseline distribution based solely on population within each settlement is described;
 - Thirdly the use of evidence which provided reality checking to adjust the baseline targets is described;
 - Fourthly a brief description of the key factors relevant to the distribution within each tier of the settlement hierarchy is given.

General Principles

5.3.45 **1. Alignment with Core Strategy Vision and Objectives**

The distribution of housing growth set out in Policy HO3 reflects both the Vision and Strategic Objectives of this Plan, in particular Objectives 1,2,5 and 7. It aligns with and helps deliver the Council's key regeneration goals particularly those relating to the regeneration of the City Centre and the Canal Road Corridor. It supports the Council's aspirations to lever investment into the improvement of Holme Wood.

5.3.46 **2. Alignment with the Settlement Hierarchy**

The distribution of housing growth also reflects the settlement hierarchy defined within Section 3 of this Plan. The use and articulation of a settlement hierarchy in guiding and controlling the distribution of growth and development is a tool already used and established within both the RUDP and the revoked RSS. Using the settlement hierarchy as a central element to the location strategy ensures that sustainability is embedded since the settlement hierarchy directly reflects the nature and role of those settlements and the concentration of jobs, services, and public transport links within the higher order settlements.

5.3.47 **3. Maximising the Benefits of Development and Growth**

Given the scale of development and growth which the District needs to accommodate it is important that development where it does occur provides maximum benefits both direct and indirect to the local community. While other policies within this document deal with detailed matters such as the design and quality of new homes, the distribution of development can also play a role in a number of ways including the reclamation of derelict land, area based regeneration initiatives, securing investment for the improvement of existing neighbourhoods such as at Holme Wood, or supporting the retention of local services in smaller settlements and more rural parts of the district.

5.3.48 4. Minimising The Impact on Critical Environmental Assets

The District contains a rich variety of assets both within the rural and urban environments ranging from conservation areas and listed buildings to wildlife habitats and green infrastructure. It is therefore important that as far as possible and practicable the distribution of development assists the retention and conservation of these assets.

Transport and Infrastructure

- At the various stages of the production of the Core Strategy a common theme and 5.3.49 concern among the general public has been both current and future shortfalls in the infrastructure necessary to support growth. As is outlined elsewhere in this document, the ongoing development of an efficient transportation network will be essential in supporting the district's economy, reducing pollution, and reducing the potential effects of global warming. However based on the work carried out as part of the Transport Study, the Council does not consider that transport is a main factor which can be used to determine the strategic distribution of housing growth. This is because in appraising a range of earlier options the Transport Study was unable to identify any option which was sufficiently superior in terms of transport related objectives to support a transport led choice. All options including the then draft preferred option were found to have significant impacts on the road and public transport network which will require further analysis and ultimately significant new investment. The approach within the Core Strategy is therefore to put forward a package of policies within the section on Transport and Movement designed to ensure that the transport network is used efficiently and, based on the proposed distribution of growth, to identify those priority corridors where additional work needs to be undertaken to formulate plans for carefully directed investment. These matters are outlined in more detail in Section 6 and within the Infrastructure Plan which has been published alongside the Core Strategy.
- 5.3.50 The Infrastructure Plan also details the key issues and priorities for investment in other areas in particular in education. As with transportation there are no educational capacity drivers which favour a particular housing distribution i.e. educational capacity is an

ongoing issue across much of the District. The confirmation of the Council's approach to meeting future housing need is likely to increase certainty for the educational planning process and therefore allow the authority to identify its plans and proposals for meeting future need and bidding for and securing the necessary funding.

The Baseline Distribution – Population Proportionate Targets

5.3.51 Having determined the general principles underlining the distribution of housing growth the first stage in deriving settlement targets was to develop a base line distribution which could be then compared and reality checked against a range of criteria. A population proportionate distribution was therefore produced. Using Census 2011 data and GIS software, an estimate was made of the population within the settlement boundaries of each town, village, or in the case of the regional city, quadrant. No attempt was made to assign population in rural areas outside these settlement boundaries. The district wide housing requirement of 42,100 was then assigned according to the proportion of population within the each settlement. The housing distribution which would result from such an approach is indicated in table HO3 below:

Table HO3: Baseline Distribution of Housing RequirementBased Solely on Population

The Regional City of Bradford	28,324		
Bradford City Centre	293	Bradford NE	7,436
Shipley & Canal Rd Corridor	115	Bradford SW	7,894
Shipley	1,485	Bradford NW	6,222
Bradford SE	4,878		
The Principal Towns	6,730		
likley	1,194	Bingley	1,470
Keighley	4,066		
Local Growth Centres	3,076		
Queensbury	734	Silsden	633
Burley In Wharfedale	518	Thornton	483
Menston	362	Steeton With Eastburn	346
Local Service Centres	3,970		
Addingham	263	East Morton	109
Cottingley	395	Harden	133
Baildon	1,351	Haworth	483
Cullingworth	215	Oakworth	315
Denholme	225	Oxenhope	155
Wilsden	325		

Adjustment of the Baseline Distribution Based on Reality Checking

5.3.52 The baseline distribution does not necessarily reflect either the full range of general principles outlined above and nor does it reflect the realities of land supply and environmental constraints. The key factors and evidence which were therefore used to adjust and finalise the housing distribution were as follows:

5.3.53 1. Land Supply (SHLAA)

The updated SHLAA provides data on not only the total deliverable and developable capacity within each settlement but also the nature of that supply including the split between greenfield and brownfield land and the amount of Green Belt. The SHLAA therefore provides the most critical element of the reality checking process. In some cases account has been taken of information on additional supply from planning applications or sites which have emerged since the cut off date for inclusion in the SHLAA.

5.3.54 2. Bradford Growth Assessment

The Bradford Growth Assessment provides a strategic level assessment of which parts of the District would be capable of and most suitable for accommodating growth in the form of urban extensions or local Green Belt deletions. The key outputs from the study relevant to the consideration of the housing distribution in Policy HO3 are:

- A general assessment of the environmental, social and economic characteristics of each settlement;
- A broad and strategic review of the role and importance of the Green Belt around each settlements;
- An examination of the area around each settlement and using a sieving process the identification of areas of search which are subject to relatively low levels of constraints;
- Subjecting the areas of search and a selection of SHLAA sites to a scoring appraisal.

5.3.55 3. HRA and South Pennine Moors Birds and Habitats Surveys

A key stage in the plan making process is to assess how and whether the desired locational strategy would affect key areas designated for their wildlife and habitat value. Consultants Urban Edge have been commissioned by the Council to carry out the HRA of the Plan and in the light of an initial appraisal of the likely impacts of the housing distribution envisaged in the CSFED and the importance of the 2.5km buffer zone around the S Pennine Moors SAC/SPA boundary, further survey work of both bird activity and most valued habitats was commissioned. The overriding goal of this work was to provide spatial data so that bird activity and valued habitats could be mapped and compared to the incidence of potential edge of settlement development sites (taken from the SHLAA) within the 2.5km buffer zone.

- 5.3.56 The settlement distribution contained within Policy HO3 therefore reflects the results of this work and the potential need to avoid or minimise direct and indirect affects on any key areas.
- **4. Flood Risk and the Sequential Approach to the Distribution of Housing Growth** A key goal within the NPPF is that Local Plans should avoid development within the areas of highest flood risk and utilise a sequential approach to direct development to areas of lowest risk. This is reflected in the Core Strategy in a number of ways. Firstly the SHLAA has, in line with the definitions within the NPPF, ruled as unsuitable any site falling within flood zone 3b, the functional flood plain. The Council has also assessed the distribution of

remaining potential sites against flood zones 3a which is considered at high risk of flooding and flood zone 2 which is considered medium risk.

- 5.3.58 The overriding aim has been to set settlement targets at a level which will allow the site allocations process to steer development to areas designated as flood zone 1. Based on the housing targets in Policy HO3 it is envisaged that in 25 out of the 27 settlements the housing quantums are capable of being realised without the use of any flood zone 2 or 3a land.
- 5.3.59 The only exceptions are Bradford City Centre and the Shipley Canal Road Corridor. Within the City Centre the housing targets to an extent reflect permissions already granted together with further ongoing viability work to suggest the levels of new homes that could reasonably be accommodated in the two key regeneration areas. The Council has also taken account of the balance in sustainability terms of locating development within the Regional City with its access to services, infrastructure and public transport compared to increasing further the levels of development in lower order settlements. The presence of environmental constraints such as possible impacts on the South Pennine Moors SAC / SPA has also



Shipley Canal Road Corridor

been taken into account. Moreover the accommodation of development within the Canal Road Corridor and the City Centre will have significant investment and regeneration benefits. The two relevant AAP's for these areas are already assessing in more detail how flood risk can be minimised or mitigated and will bring forward policies and proposals to this end. Overall it is therefore considered that the wider sustainability benefits of an approach which meets some of the housing need of the Regional City in these two areas significantly outweighs the flood risk issue.

5.3.60 **5. Other Factors – Maximising Previously Developed Land / Minimising Green Belt** / Delivering Affordable Housing

The final stage in testing the housing distribution contained within Policy HO3 was a testing process to see if there were variations on the option which would give better outcomes in terms of other key goals of the Core Strategy. By reference to the results of the SHLAA it can be confirmed that the settlement targets within Policy HO3 fully utilise all of the deliverable and developable previously developed land identified.

5.3.61 Similarly there is no configuration of targets which would produce a significantly lower take up of green belt land. While greater quantums of affordable housing could theoretically be secured by a distribution weighted more towards the settlements of Wharfedale, such an approach would not reflect the distribution of need for such affordable housing which according to the updated SHMA is concentrated more in the urban areas of the District.

The Regional City of Bradford

Table HO4: An indication of how the proposed settlement distribution departs from the baseline population proportionate target

Area	HO3 target	% of District Wide Total	Difference from Baseline Target
The Regional City of Bradford	27,750	65.9%	-574
Bradford City Centre	3500	8.3%	+3207
Shipley & Canal Rd Corridor	3100	7.4%	+2985
Shipley	750	1.8%	-735
Bradford SE	6000	14.3%	+1122
Bradford NE	4400	10.5%	-3036
Bradford SW	5500	13.1%	-2394
Bradford NW	4500	10.7%	-1722

5.3.62 Overall the proposed level of growth within the Regional City lies just below the suggested baseline target and represents an increased concentration in this area as compared to that within the CSFED. This has been made possible by the updated and larger land supply within the area in the updated SHLAA and by the results of the Bradford Growth Assessment which has identified additional potential areas of search for development around the city additional to those already contained within the SHLAA.

- 5.3.63 There are however significant differences between the different parts of the Regional City. Shipley, Bradford NE, SW and NW have all been assigned lower numbers than would be the case if the baseline targets were followed, largely due to land supply constraints in these areas. Conversely the master planning areas of the Shipley Canal Road Corridor and City Centre areas envisage the creation of new or significantly expanded housing concentrations in areas where the existing populations are low.
- 5.3.64 Conversely the Bradford SE figure lies well above the baseline target and this reflects the potential land supply in the area and the proposals for development both within and adjoining Holme Wood based upon the approved Neighbourhood Plan. It also reflects the results of the Bradford Growth Assessment which recommended the SE area as a particular focus for growth.

The Principal Towns

Table HO5: An indication of how the proposed settlement distributiondeparts from the baseline population proportionate target

Area	HO3 target	% of District Wide Total	Difference from Baseline Target
The Principal Towns	6,900	16.4%	+170
llkley	1000	2.4%	-194
Keighley	4500	10.7%	+434
Bingley	1400	3.3%	-70

5.3.65 The proposed overall target for the Principal Towns is also close to that indicated within the baseline distribution. However, the housing target for Ilkley lies slightly below both the baseline target and the target proposed within the CSFED. This reflects the redistribution of development away from the areas most sensitive due to their proximity to the designated South Pennine Moors SPA / SAC. The Bingley target has been set slightly below both the baseline number and below the total capacity within the SHLAA. This is because the majority of the SHLAA capacity for Bingley is within the Green Belt and although Bingley is a sustainable location for growth there is also a need to ensure that the strategic functioning of the Green Belt in the area is not compromised. Conversely the target for Keighley lies a little above the suggested baseline and this reflects the towns role as a Principal Town, and the current and future potential land supply in this area.

The Local Growth Centres

Table HO6: An indication of how the proposed settlement distributiondeparts from the baseline population proportionate target

Area	HO3 target	% of District Wide Total	Difference from Baseline Target
Local Growth Centres	4900	11.6%	+1824
Queensbury	1000	2.4%	+266
Thornton	700	1.7%	+217
Silsden	1200	2.9%	+567
Steeton With Eastburn	700	1.7%	+354
Burley in Wharfedale	700	1.7%	+182
Menston	600	1.4%	+238

5.3.66 The Local Growth Centres are all locations which have been promoted to the third tier of the settlement hierarchy by virtue of their status as sustainable local centres and their role, function and accessibility to larger settlements such as Bradford, Keighley or Ilkley. They have a role in taking some of the development which would otherwise be allocated to the Regional City, to Keighley or to Ilkley. The proposed targets for the Local Growth Centres reflect a balance between recognising their potential to accommodate some growth, the contribution that development can make to meeting housing need but also the need to reflect a number of environmental constraints. These include landscape and topography in the case of Queensbury and potential direct and indirect impacts on the South Pennine Moors SPA / SAC, and the 2.5km buffer zone around it, in the case of Silsden, Burley In Wharfedale and Menston.

The Local Service Centres

 Table HO7: An indication of how the proposed settlement distribution

 departs from the baseline population proportionate target

HO3 target	% of District Wide Total	Difference from Baseline Target
2550	6.1%	-1419
200	0.5%	-63
350	0.8%	-1001
200	0.5%	-195
350	0.8%	+135
350	0.8%	+125
100	0.2%	-9
100	0.2%	-33
400	1.0%	-83
200	0.5%	-115
100	0.2%	-55
200	0.5%	-125
	2550 200 350 200 350 350 100 100 400 200 100	HO3 target District Wide Total 2550 6.1% 200 0.5% 350 0.8% 200 0.5% 350 0.8% 350 0.8% 350 0.8% 100 0.2% 400 1.0% 200 0.5% 100 0.2%

5.3.67 The targets proposed for the Local Service Centres lie on the whole below the baseline targets and also in the main are lower than the targets proposed within the CSFED. The Council considers that these are the least sustainable locations for growth within the District and development here should be focused more on meeting local needs and supporting local services. The only settlements where the targets lie a little above the baseline are for Cullingworth and Denholme which reflects the potential from existing sites and new redevelopment opportunities in these areas and their relatively strong performance in sustainability scoring within the growth study.

A. In accordance with the vision and spatial principles set out in this Pla forthcoming Allocations, Bradford City Centre and Shipley & Canal Road will allocate sufficient land to meet the residual housing requirement of a 42,100 for the District between April 2013 and April 2030. This requireme be apportioned as follows: 3,500 (8.3% of the District total) within the Bradford City Centre Area 3,100 (7.4% of the District total) within the Shipley & Canal Road Con AAP; 35,500 (84.3% of the District total) within the Allocations DPD. B. The Apportionments between the different settlements of the District to as follows: The Regional City of Bradford (27,750) Divided as follows: Bradford City Centre 3,500 Canal Road 3,100 Bradford NE 4,400 Canal Road 3,100 Bradford NW 4,500 The Principal Towns (6,900) Divided as follows: Ilkley 1,000 Keighley 4,500 Local Growth Centres (4,900) Divided as follows: Burley in Wharfedale 700 Menston 600 Queensbury 1,000 Silsden 1,200 Thornton 700 Local Service Centres (2,550) Divided as follows: Addingham 200 East Morton 100 Baildon 350 Harden 100 Haworth 400 Coullingworth 350 Oxenhope 100 Wilsden 200	OUTCOMES	INDICATORS		TARGETS
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Managing Housing Delivery in a Sustainable Way

Managing Land Release Via Phasing

- 5.3.68 The Council believes that there is a clear need for a managed release of land over the Plan period if all of the goals of delivering housing growth and securing sustainable patterns of development and successful neighbourhoods are to be achieved. Policy HO4 therefore reflects this need for a managed approach and will help achieve Strategic Objective number 3 of the Plan.
- 5.3.69 The scale of housing delivery envisaged in this Core Strategy is of a very different order to either of the last 2 statutory development plans for the District and significantly in excess of the level of house building delivered by the housing industry in recent years.
- 5.3.70 If unmanaged, the scale of this delivery could put unacceptable pressure on both community level resources such as schools and health facilities and strategic infrastructure such as improvements to the transportation network. It could also undermine efforts to maintain a focus on previously developed land and urban regeneration.
- 5.3.71 Releasing all sites and land at the same time could actually undermine delivery if it were to result in the rate of new development outstripping an area's ability to provide new infrastructure. A managed and phased release of sites therefore has the potential to support rather than undermine housing delivery as it will place a focus on the early release of deliverable and sustainable sites which are not dependent on significant new infrastructure and will place a focus ensuring that the timing of both housing and infrastructure delivery are aligned.

Policy HO4: Phasing the Release of Housing Sites

A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the release of land within the Local Plan will be phased.

B. The plan period will be split into 2 phases with phase 1 covering the first 8 years and the second phase the final 7 years of the plan period to 2030. The Allocations DPD will therefore need to allocate sufficient land to meet 8/15 of its housing requirement as specified in Policy HO3 within the first phase and 7/15 of it's housing requirement within the second phase.

C. Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out within the Allocations DPD, but will be based on the following principles:

- 1. The need to have regard to delivering the overall housing requirement in line with Policy HO1;
- 2. The need to maintain a 5 year supply of deliverable sites as required by the NPPF;

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- 3. The need to ensure that within each phase the sites allocated will provide for a range and choice of dwellings of different types, sizes and tenures which will meet local need;
- 4. The need to meet the targets for development on brownfield land as set out in this document;
- 5. The need to prioritise and not undermine proposals for urban regeneration within the Regional City of Bradford and in Keighley;
- 6. The need to ensure that the scale and timing of development within the different strategic planning areas of the District is co-ordinated with the provision of new infrastructure;
- 7. The need to ensure an even delivery pattern within smaller settlements and rural areas where sites are aimed at meeting local and affordable housing need over the whole period of the Local Plan.

D. Consideration will be given to bringing forward large or complex sites within the first phase where this would aid delivery in full in the plan period or where it would help to secure required investment and infrastructure;

E. The Council will maintain a five year supply (plus NPPF buffer) of deliverable housing sites through considering release of the subsequent phase of sites to help address any persistent shortfall.

| OUTCOMES | INDICATORS                    | TARGETS |
|----------|-------------------------------|---------|
|          | Process policy, no indicators |         |

- 5.3.72 The use of a phasing policy will effectively mean that some sites are held back from being developed until the second half of the plan period. It is important therefore that both details of the phasing approach and the selection of sites for the phases are designed to meet the housing delivery goals and targets of this document as well as those relating to co-ordinated infrastructure delivery and meeting previously developed land targets.
- 5.3.73 The Council will ensure that Policy HO4 supports housing delivery and regeneration in a number of ways by being selective in where the phasing policy will apply, by ensuring that the range of criteria for the actual placement of sites within a phase are designed to be broad and supportive of maintaining housing delivery, and by emphasising the importance of maintaining a 5 year land supply of deliverable sites.
- 5.3.74 Policy HO4 will therefore apply to the assessment and allocation of sites within the Allocations DPD. However within the Shipley & Canal Road Corridor and Bradford City Centre AAP's all housing allocations will be released at the start of the plan period. There are several reasons for this.
  - Firstly this will ensure that a greater supply of sites is released in the early stages of the Plan period thereby enhancing delivery in the areas of the District where there is the most pressing need for new homes and for regeneration;
  - Secondly, it reflects the fact that the preparation of the AAP's is now at an advanced stage.

- In the case of the Shipley and Canal Road Corridor AAP the achievement of the proposed 3,100 homes is dependent on a small number of large and complex sites all of which have been assessed as potentially benefiting from the certainty that early release would provide.
- In the case of the City Centre AAP there is very little differentiation between sites with all being previously developed land and all being highly accessible to public transport services. The advanced nature of the work on the AAP has also given assurance that there are no significant infrastructure based reasons for a phased land release in this area. The Council also considers that in most cases these sites would have the potential to further establish and accelerate the emerging pattern of investment and regeneration in the City Centre that is now underway. The market within the City Centre is changing at a rapid rate and it is considered important that the AAP takes a flexible approach which supports delivery on sites as and when proposals for development and investment arise.
- 5.3.75 As a result of allocation of 8/15 of the supply within phase 1 of the Allocations DPD and the allocation of all housing land within phase 1 within the two AAP's, the total land supply released at the start of the Plan period will amount to at least 25,533 units or 61% of supply.
- 5.3.76 With regards to the detail of the phasing policy, the decision to identify two phases and to make the first phase of a longer period than the second has been taken to ensure flexibility within the land supply and support delivery. An eight year first phase will also ensure that the use of a phasing policy will not undermine the ongoing existence of a 5 year land supply of deliverable sites.
- 5.3.77 Within strategic planning sub areas, careful consideration will need to be given to assigning within each phase a variety of site types and site locations to meet the needs for different types, sizes and tenures of housing and this will mean that although there will be a focus on brownfield sites, greenfield sites will need to be assigned to the first part of the plan period. The results of the SHLAA will also be used to ensure the potential timing of delivery on sites is also taken into account. The Local Infrastructure Plan will also be a key input into the phasing process. To be clear, although the Council wishes to encourage the take up and delivery of previously developed land, there will be no bar on a particular type of site being placed within the first phase.
- 5.3.78 While the Allocations DPD as a whole will need to allocate sufficient land in the first phase to meet 8/15 of it's plan wide housing requirement it will not be a requirement for each settlement to release land to precisely the same proportions. In some settlements more than 8/15 may be released within the first phase and in some slightly less. This reflects the varying circumstances on a settlement by settlement basis and the fact that some settlements will face more significant infrastructure issues while immediately deliverable land supply will also vary. 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.
- 5.3.79 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.

- 5.3.80 The overall principles for the phasing approach within the Local Plan are therefore set out in this document within Policy HO4. The Housing Implementation Framework included in Appendix 6 also sets out how the Council will monitor delivery and this includes the implications of under achievement of on housing completions and brownfield development targets for the phasing approach. The Council will also consider the early release of phase 2 sites in the unlikely event of a persistent shortfall (defined as being over 2 successive monitoring year periods) in 5 year land supply. Appendix 6 also includes the expected housing delivery trajectory. This in turn reflects the Council's approach to maintaining a 5 year land supply which includes allowing for a 20% buffer in additional supply brought forward from the later part of the plan period and resolving the backlog in previous provision over the full plan period (the 'Liverpool approach'). This reflects the need to boost delivery to meet the backlog but at a rate which would be practicable and deliverable.
- 5.3.81 Finally, to be clear, Policy HO4 is aimed at the process of allocating and phasing the release of sites in a managed and sustainable way in the subsequent Allocations DPD. It is not the intention that Policy HO4 be applied to prevent other future sustainable housing development proposals (which would be considered windfall development) from coming forward.

#### **Density Targets and the Efficient Use of Land**

- 5.3.82 The Council considers that one of the key components of a sustainable approach to growth and a sustainable approach to land release is to ensure that land is used as efficiently as possible.
- 5.3.83 It has already been demonstrated under Policy HO2 that the District faces a major challenge in finding sufficient land to meet the District's growing population. Under delivery on sites, if allowed to happen, would accumulate over time, resulting in greater dispersal of development than is necessary. It would also lead to the need to release further green field or Green Belt land.
- 5.3.84 The Government's NPPF therefore recognises that it is a legitimate role of the local plan to set density targets which reflect local circumstances. The local circumstances which warrant such targets in this plan include the massive scale of development which is needed to meet the District's growing population and the relatively constrained supply of deliverable land to meet that need, particularly within the main urban areas.
- 5.3.85 In this context and in having regard to the need to promote urban regeneration and avoid the dispersal of development and increased journeys by car, the Council considers that most developments should achieve a minimum density of 30 dwellings per hectare.

#### **Policy HO5: Density of Housing Schemes**

A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, developers will be expected to make the best and most efficient use of land.

This will mean delivering the most houses possible while taking account of the need to arrive at a well designed layout which reflects the nature of the site, its surroundings and given the type and size of housing needed in the area.

B. Densities should normally achieve at least a minimum of 30 dwellings per hectare, although higher densities would be possible in areas well served by public transport and/or close to the City Centre and Principal Town Centres.

C. Detailed density targets applying to specific Sub Areas will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road Corridor DPD's. This will include those areas where local character of the area would warrant lower densities or areas well served by public transport where higher densities may be required.

| The efficient use of land<br>which while consistent<br>with delivering the most<br>appropriate type, size and<br>quality of accommodation,<br>also maximises delivery on<br>sites, therefore minimising<br>both total land take and land<br>take from green field and<br>green belt sources;Number and percentage<br>of dwellings (district wide)<br>completed at density<br>between 30 & 49 dph;<br>IND6(H)90% of units on<br>completed housing<br>schemes are at a<br>minimum density of<br>30dphThe promotion of compact<br>and sustainable patterns of<br>development which minimize<br>car journeys and thus climateNumber and percentage<br>of dwellings (district wide)<br>completed at density above90% of units on<br>completed housing<br>schemes are at a<br>minimum density of<br>30dph | OUTCOMES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | INDICATORS                                                                                                                                                                                                                                                                                                                                                                                                   | TARGETS                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| change impacts, which<br>support the regeneration of<br>urban areas and which allow<br>for the efficient delivery of<br>services and infrastructure;50 dph;<br>IND6(H)Local density targets<br>included in site allocating<br>DPD's;<br>IND6(H)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The efficient use of land<br>which while consistent<br>with delivering the most<br>appropriate type, size and<br>quality of accommodation,<br>also maximises delivery on<br>sites, therefore minimising<br>both total land take and land<br>take from green field and<br>green belt sources;<br>The promotion of compact<br>and sustainable patterns of<br>development which minimize<br>car journeys and thus climate<br>change impacts, which<br>support the regeneration of<br>urban areas and which allow<br>for the efficient delivery of | Number and percentage<br>of dwellings (district wide)<br>completed at density below<br>30 dph;<br>IND6(H)<br>Number and percentage<br>of dwellings (district wide)<br>completed at density<br>between 30 & 49 dph;<br>IND6(H)<br>Number and percentage<br>of dwellings (district wide)<br>completed at density above<br>50 dph;<br>IND6(H)<br>Local density targets<br>included in site allocating<br>DPD's; | 90% of units on<br>completed housing<br>schemes are at a<br>minimum density of |

|        | LEAD ROLES                                                                                                                                    | DELIVERY MECHANISMS                                                                                                                                                                                                                                                                                                                                                           |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        | CBMDC<br>Developers – market<br>housing<br>RSL's – social housing<br>HCA<br>CABE                                                              | Strategic Policy via Core Strategy<br>Land Allocations in Local Plan<br>Development Management Decisions<br>Pre Application Advice and Negotiation<br>Neighbourhood Plans<br>AMR                                                                                                                                                                                              |
| 5.3.86 | then must deliver the most hous<br>such as the nature of the site an                                                                          | but in Policy HO5 is that developers must assess sites and<br>es possible, having taken account of all relevant factors<br>d its surroundings, the type and size of housing which is<br>market and social housing need and demand, and any<br>aints.                                                                                                                          |
| 5.3.87 | 30dph is by no means onerous a wasted but sufficiently low to ens                                                                             | ost occasions this will lead to achieving at least 30dph. A<br>and is set sufficiently high to ensure that land is not<br>sure that the policy need not undermine delivery. It is a<br>tly and successfully achieved in schemes within the<br>JDP.                                                                                                                            |
| 5.3.88 | higher yields when planning app<br>be required where sites are loca<br>taken as areas within city or tow<br>stations or within a 400m of a bu | allows for flexibility for the negotiation of either lower or<br>lications are submitted. In particular higher densities may<br>ted in areas well served by public transport. Well served is<br>n centres, within an 800m radii around existing railway<br>is stop offering a service four times per hour / 15 minute<br>following centres: Bradford, Leeds, Halifax, Ilkley, |
| 5.3.89 | of their areas based on the sprea                                                                                                             | te allocating DPD's to set detailed density targets for parts<br>ad of sites being allocated, the need to meet the housing<br>d based on the best information available at the time on<br>mand.                                                                                                                                                                               |
| 5.3.90 | Net density is usually determined<br>developable area of the site. The<br>which will be developed for hous                                    | argets set out within Policy HO5 relate to net densities.<br>d by measuring the number of dwellings against the net<br>e net developable area would include only those site areas<br>sing and directly associated uses, including local access<br>den space, car parking areas, incidental open space and<br>se are provided.                                                 |
|        | Maximising the Use o                                                                                                                          | f Previously Developed Land                                                                                                                                                                                                                                                                                                                                                   |
| 5.3.91 | planning system should encoura                                                                                                                | nt states that one of its core planning principles is that the<br>ge the effective use of land by reusing land that has been<br>d land), provided that it is not of high environmental value.                                                                                                                                                                                 |

- 5.3.92 If growth in Bradford is to be accommodated in a sustainable way then it is essential that the land supply available for development is used in the most effective way. This means making best use of previously developed (brownfield) land which is currently deliverable for the provision of new homes and using a range of direct and indirect initiatives to bring forward other areas of such land over the plan period. The use of brownfield land is crucial because it tends to be concentrated in the urban areas of the district and its development, in addition to providing much needed homes, has the potential to provide wider benefits such as the removal of derelict land and buildings, and improvement of the local environment. In doing so it has the potential to improve the prospects for further development and investment over time.
- 5.3.93 Policy HO6, together with the implementation strategy included in Appendix 6 therefore sets out the priority that the Council will give to maximising the contribution which previously developed land makes to the provision of new homes, and indicates targets for the proportion of housing completions which should be on previously developed land which reflects the evidence base, in particular the SHLAA. The policy therefore supports both the Core Strategy's place specific Vision for Bradford and Strategic Objective 2.
- 5.3.94 Government guidance contained within the NPPF allows for the setting of locally appropriate targets for the use for the use of brownfield land. The targets within element C of the Policy have been carefully considered and reflect the results of the latest SHLAA.
- 5.3.95 The target proportions do lie significantly below the proportions achieved and reported on in the Annual Monitoring Reports (AMR) of recent years. However those AMR proportions are misleading since the absolute number of completions in the District over this period has been extremely low. The SHLAA results indicate that there is no way that remotely the same proportions of brownfield development can be achieved if the quantums of delivery are to be increased from the recent levels of around 700/annum to something well over 2000 as required over the whole period to 2030.The targets therefore, although challenging, do reflect the realities of the amount of deliverable and developable brownfield land within the District.

# Policy HO6: Maximising the Use of Previously Developed Land (PDL)

A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the plans, programmes and strategies of the Council will give priority to the development of previously developed land and buildings.

This will mean achieving the maximum possible overall proportion of housing development on previously developed land consistent with:

- 1. the deliverable and developable land supply;
- 2. the need to maintain a 5 year land supply of deliverable sites;
- 3. the need to coordinate development with infrastructure provision; and
- 4. the need to maintain delivery of the scale and type of homes required throughout the plan period;

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B. District wide, 50% of total new housing development over the Plan period will be on previously developed land.

C. In order to achieve the District wide target of 50%, the Allocations, Bradford City Centre and Shipley and Canal Road DPD's should bring forward land and manage its release so as to deliver the following proportions of housing development on previously developed land:

- In the Regional City of Bradford 55%
- In the Principal Towns 50%
- In the Local Growth Centres 15%
- In the Local Service Centres 35%

D. The Council will monitor performance against these targets and will take action if performance slips outside of the defined acceptable ranges as set out in the housing implementation framework.

| INDICATORS                                                                                                                                                                                                            | TARGETS                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Percentage of new and<br>converted dwellings on<br>previously developed<br>land – expressed at district<br>wide level, DPD level,<br>by settlement hierarchy<br>category, and by individual<br>settlement;<br>IND5(H) | Target as set out in<br>Policy HO6                                                                                                                                                                                                                                                                                                                                                                |
| DELIVERY MECHANISMS                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                   |
| Strategic Policy via Core Strate<br>Land Allocations in Local Plan<br>Development Management De<br>Local Plan AMR<br>Local Investment Plan<br>Neighbourhood Plans                                                     |                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                       | Percentage of new and<br>converted dwellings on<br>previously developed<br>land – expressed at district<br>wide level, DPD level,<br>by settlement hierarchy<br>category, and by individual<br>settlement;<br>IND5(H)<br><b>DELIVERY MECHANISMS</b><br>Strategic Policy via Core Strate<br>Land Allocations in Local Plan<br>Development Management De<br>Local Plan AMR<br>Local Investment Plan |

- 5.3.96 Appendix 6 of this Core Strategy includes an assessment of how the pattern of brownfield delivery is likely to evolve over the plan period and the ways, both direct and indirect, in which the Council will promote and encourage the take up of brownfield land.
- 5.3.97 The district wide target of 50% of new housing on brownfield land is a realistic one based on the land supply data within the SHLAA. The targets though challenging are considered achievable. The SHLAA has taken a cautious view of development potential within the City Centre and there are a range of schemes not currently within the trajectory which may well

come forward once the economy recovers albeit at lower densities than was the case when permissions were originally granted. Further brownfield supply may also materialise via the recycling of land in the urban areas, particularly within the Bradford and Keighley, and as a result of recent Government changes to allow the conversion of offices to residential use.

- 5.3.98 Within the smaller settlements within the District the Local Growth Centres and the Local Service Centres the PDL targets have been set at much lower levels. Again this reflects the nature of the land supply which is much more heavily weighted towards green field sites than is the case in the urban areas of the District.
- 5.3.99 For purposes of clarity with regard to monitoring, the targets set out in Policy HO6 are for actual delivery of housing completions. Also the 4 targets which refer to the Regional City, The Principal Towns, The Local Growth Centres, The Local Service Centres are for the delivery across each tier of the settlement hierarchy as whole. This therefore allows flexibility for individual settlements to achieve higher or lower proportions according to the circumstances in each case.
- 5.3.100 It is important to stress that the Council are not proposing any form of moratorium of the development of green field sites, nor is it proposing that a site's status as green field or brown field land should be the only factor in the determination of which sites are allocated within the Allocations, Bradford City Centre and Shipley and Canal Road DPD's. In order to gain an overall appreciation of the Council's approach to the release of land, Policy HO6 should be read alongside Policy SC4 which sets out a sequential approach to the location of development and to Policy HO7 which sets out more detailed criteria and principles by which sites will be compared, assessed and selected for allocation.

### **Housing Site Allocation Principles**

- 5.3.101 Given the scale of housing growth required to meet the needs of the District's growing population, it is essential that the decisions taken in selecting sites for development results in the most sustainable portfolio of sites possible. The site selection process should wherever possible not only avoid sites which would cause significant harm to the environment but should also provide positive benefits such as in removing derelict land.
- 5.3.102 While this Core Strategy does not in itself allocate sites it is considered important that it sets the strategic policy framework to guide this process in the rest of the Local Plan. Both the NPPF and the Core Strategy's vision suggest that sustainable development and management should be at the heart of the growth and economic transformation that is envisaged over the period of this plan. Policy HO7 will help achieve this. Furthermore the criteria listed within the policy will assist in achieving a range of the objectives set out in Section 3, particularly those aimed at safeguarding and enhancing the environment of the District.
- 5.3.103 The policy approach to allocating sites begins at its most strategic level within Policy SC5 which describes the relative priority to be given to site locations within settlements as opposed to extensions of those settlements. However there are a further range of key criteria which should be used in the site allocation process and which are not necessarily connected to a site's status as within or extending a settlement and these are outlined in Policy HO7 overleaf.

#### **Policy HO7: Housing Site Allocation Principles**

In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, sites will be identified, assessed, compared and allocated for housing development in the Allocations DPD, the Shipley & Canal Road Corridor AAP and the Bradford City Centre AAP based on a range of principles including:

A. The need to allocate sufficient deliverable and developable sites to meet the targets set out in Core Strategy Policies HO1 and HO3;

B. Prioritising the allocation of sites which would assist in the regeneration of the Plan area;

C. Maximising the use of previously developed land within the Plan area and prioritising their development via phasing policies - subject to the maintenance of a range of sites which meet local need and provision of a 5 year supply of deliverable sites;

D. Prioritising the allocation of sites which would remedy identified deficiencies in local infrastructure and services including open space, community and education facilities;

E. Minimising the use of green belt land within the Plan area;

**F.** Maximising positive environmental benefits of development by prioritising the allocation of sustainably located sites which:

- 1. Would result in significant environmental improvements to an area for example by reclaiming derelict land;
- 2. Would enhance biodiversity or contribute to the aim of achieving no net loss of biodiversity;
- 3. Would provide opportunities to draw energy supply from decentralised and renewable / low carbon sources;
- 4. Would provide opportunities to create or enhance green infrastructure particularly those that link urban green spaces with the wider countryside.
- G. Minimising adverse environmental impacts of housing growth, in particular with regard to climate change, biodiversity and flood risk, by wherever possible:
- 1. Selecting sites accessible to a range of services and community facilities thereby reducing the need to travel;
- 2. Selecting sites accessible to quality public transport services and in accordance with the public transport accessibility approach as set out in Policy SC5, Policy TR1 and Appendix 3;
- 3. Avoiding development of sites which would result in the fragmentation or isolation of natural habitats;

....>

- 4. Ensuring that sites relate well to the form and character of the settlement and do not detract from its landscape setting;
- 5. Minimising the loss of trees and woodland;
- 6. Avoiding sites or locations which would pose unacceptable risk to health and safety;
- 7. Applying a flood risk sequential approach to direct development to areas of lowest flood risk.

| OUTCOMES | INDICATORS                    | TARGETS |
|----------|-------------------------------|---------|
|          | Process policy, no indicators |         |

- 5.3.104 Policy HO7 sets out some of the most important guiding principles which will be used to compare, contrast and evaluate alternative candidate sites for housing development within the Allocations DPD, the Bradford City Centre AAP and the Shipley & Canal Road Corridor AAP.
- 5.3.105 The Policy does not represent an exhaustive list of all the factors which will be used in selecting sites nor does it indicate a particular order of preference in applying these principles. Sites which score positively against one or more of these principles will not necessarily be considered suitable for allocation and equally sites may fall foul of a particular element of Policy HO7 but still have sufficient benefits to warrant allocation. The Policy does however indicate the key considerations that will shape the allocation process given the particular challenges and issues facing the district.
- 5.3.106 The potential for sites to contribute to regeneration in the District for example either directly by securing the development of problem sites or indirectly by virtue of investment and job creation will be a key factor, as will the opportunities to use brown field land thereby relieving or reducing the amount of development which is required on green field or Green Belt locations. Equally on occasions larger sites may provide a way via mixed use schemes to integrate improvements to community facilities or provide improvements to play areas and open space. Indirectly the development of larger sites may make it feasible to pursue additional investment in infrastructure in an area which alternative smaller and dispersed sites may not.
- 5.3.107 Section F of Policy HO7 indicates a range of positive environmental benefits which could be secured alongside housing development such as enhanced biodiversity and decentralised / low carbon energy supply. Decentralised energy is that which is produced locally near to where it will be used. Generating energy in this way is far more efficient as only 22% of the energy inputted into our national grid by power stations is actually used by consumers. The rest is lost in transmission over vast distances, in inefficient generation at the power station or by domestic inefficiency. Low carbon means power that comes from sources that produce fewer greenhouse gases than traditional means of power generation. It includes zero carbon power generation sources such as wind, solar, and geothermal, as well as sources with lower level emissions such as natural gas.
- 5.3.108 Section G identifies a range of principles which should be applied to the consideration of candidate sites in order to avoid adverse outcomes in relation to climate change,

biodiversity and flood risk. Selecting sites which are accessible to services and public transport will be key and both the Transport section of this document and the site allocating Local Plan documents will develop a range of accessibility criteria on which to make such assessments.

# **Housing Mix**

- 5.3.109 Housing choice is essential in meeting the wider housing needs of the District. Sustainable mixed communities require a variety of housing in terms of size, type, tenure and price to meet the needs of different households. A key objective is to ensure that planned housing growth will deliver a mix and balance of housing, which meets the future needs of the District's population.
- 5.3.110 Policy HO8 will ensure that new residential development provides for a range of housing types to help support the creation of mixed, balanced and inclusive communities. The Policy supports objectives 4, 10 and 11 of the Core Strategy.
- 5.3.111 To deliver a wide choice of high quality homes and create sustainable, inclusive and mixed communities, the Local Plan will plan for a mix of housing based on demographic and market trends and the needs of different groups in the District. The Strategic Housing Market Assessment (SHMA) identifies the need and demand for housing and the needs of different groups in the District.
- 5.3.112 On the basis of a range of evidence the SHMA concluded that Bradford District can be considered as a self contained housing market area (albeit with strong links to adjoining areas within the Leeds City Region). The SHMA identifies that there are a number of sub areas within the District which exhibit broadly similar housing market characteristics. These are illustrated in Figure HO1.
- 5.3.113 Overall, the housing market in the District is generally balanced with some market pressures in particular areas. There is a need to maintain the delivery of a variety of dwelling types and sizes to ensure that a better balance between demand and supply is achieved across the District. Evidence presented in the SHMA will help inform development priorities in specific areas within the Bradford District.
- 5.3.114 The SHMA and the District's housing strategies provide an analysis of the key housing market drivers in Bradford and identify specific groups for which need and demand must be catered for within the Local Plan. Specific groups identified as having particular housing requirements in the District include families, older people and Black and Minority Ethnic (BME) households. The key housing market drivers in the District are demographic, economic and dwelling stock drivers.
- 5.3.115 Demographic change will be a key driver of the District's housing market, both in terms of overall population and household growth and increase in the older aged population. A major strategic challenge will be to ensure a range of appropriate housing provision for Bradford's older population. There is considerable ethnic diversity within the District and an important underlying driver is the growth of the BME population. The proportion of BME households is highest in the City Central sub area, an area which also suffers from among the highest levels of overcrowding and poor quality stock in the District. Overcrowding is a



major issue in City Central and is linked to the size of BME households and reflects the need for larger properties.

5.3.116 Families account for nearly a third of the households across the District and given the likely level of population and household growth driven by natural change the current demand for core family housing products, such as houses with 2 to 4 bedrooms, will increase if there is not a strong focus on the supply on family housing.

- 5.3.117 The District is expected to see significant growth in jobs over the plan period. The provision of an appropriate range of housing will play an important role in supporting the economy. A strategic priority is to ensure the District attracts and retains economically active households; delivering a range of good quality housing types will help to achieve this.
- 5.3.118 Policy HO8 identifies the strategic housing priorities required to help address particular housing pressures and the requirements of specific groups in the District. Policy HO8 will promote mixed communities and successful places by ensuring that developments, particularly on larger sites achieve a good mix of housing, which reflects the requirements of households throughout the District.
- 5.3.119 Policy HO8 will help enhance the role of Bradford District within the wider Leeds City Region as an important business location with a good supply of housing, in support of Policy SC1. It will also support Policy HO9, HO10 and HO11 through the delivery of high quality housing schemes by ensuring developments provide a mix of housing types and tenures that meet local requirements and needs, including the supply of larger homes, particularly in areas suffering from high levels of overcrowding.

#### **Policy HO8: Housing Mix**

A. The council, will ensure that a mix and balance of housing is provided to meet the needs of the District's growing and diverse population.

B. All large sites will be expected to incorporate a mix of housing types, sizes, prices and tenures. The exact mix should be based both on market demand and evidence of local need within the District's SHMA together with any other robust local evidence or information. The location and nature of the site and its surroundings and the profile of the existing stock in the area should also be considered.

C. Specific guidance on housing mix on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans.

D. Within the District there will be a need for all types and sizes of housing but there should be a particular emphasis of the following strategic priorities:

- 1. Delivering more family housing across the District
- 2. Delivering sufficient affordable housing in accordance with Policy HO11 and meeting the needs of people on lower incomes and first time buyers
- 3. Increasing the supply of larger homes across the District, particularly in areas suffering from high levels of overcrowding
- 4. Increasing the supply of accessible housing which is able to meet people's needs throughout their lives
- 5. Increasing the supply of high quality flats, particularly in city and town centres and accessible locations
- 6. Supporting the provision of specialist accommodation for older people in suitable locations and in areas of greatest demand
| OUTCOMES                                                                                                                                                                                                                                                             | INDICATORS                                                                                                                                                                                                                                                                                                         | TARGETS                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| The delivery of housing<br>which by virtue of its type,<br>size and tenure meets the<br>needs and requirements<br>of the community, and in<br>particular meets strategic<br>housing priorities and<br>relieves problems of over<br>crowding in inner urban<br>areas. | The number of affordable<br>homes completed.<br>Corporate.<br>IND5(H)<br>The mix of housing<br>delivered with respect to<br>size, type and tenure<br>Operational<br>% of major housing<br>schemes achieving no<br>red in Building for Life<br>Assessments for Meeting<br>local housing requirements<br>Operational | 20-25% of total gross<br>housing completions should<br>be affordable housing<br>completion |
| LEAD ROLES                                                                                                                                                                                                                                                           | MAIN MECHANISMS                                                                                                                                                                                                                                                                                                    |                                                                                            |
| CBMDC<br>Developers<br>Registered<br>Providers'<br>HCA<br>The Design<br>Council                                                                                                                                                                                      | Strategic policy via Core Stra<br>Pre application negotiations<br>Local policy and allocations w<br>Development management d<br>SHMA<br>District Housing Strategies<br>AMR<br>Building for Life Assessment                                                                                                         | via DPDs                                                                                   |

- 5.3.120 Policy HO8 will be implemented through the Development Management process and be supported by guidance set out in the Housing Design Guide SPD. The Housing Design Guide will set out further guidance on how the requirements of Policy HO8 should be met.
- 5.3.121 Criteria A will help create mixed, balanced and inclusive communities, through new housing development making provision for a range of housing types, sizes, prices and tenures.
- 5.3.122 Developments will be expected to take account of housing need and demand, have regard to the composition of the local housing stock and to respond to site related issues through imaginative design solutions. Applicants should justify the proposed housing mix and demonstrate how the development will contribute to meeting the housing needs and strategic priorities of the District as set out in Policy HO8.

- 5.3.123 While it will not always be possible for small sites to achieve a mix of house types, larger sites of 0.4ha or 10 dwellings or more will be expected to deliver a mix of housing under Criterion B.
- 5.3.124 The design and layout of schemes should seek to integrate different types and sizes of homes, avoiding concentrations of similar properties being grouped together. A 'tenure-blind' approach should be taken to the design of homes and streets so that it is not easy to distinguish between private and affordable housing.
- 5.3.125 When an appropriate mix of housing on site is being negotiated, decisions should take account of local market demand, the balance between general market supply and demand and evidence of local need to ensure the site contributes to the overall mix of housing in the locality. The viability of achieving an appropriate housing mix should also be considered. The SHMA, and any more detailed and localised evidence of housing need and demand, such as local or village needs surveys, will form the main basis on which the creation of an appropriate and sustainable mix of house types within larger sites will be judged both at the level of plan making and in considering planning applications.
- 5.3.126 Criterion C allows for detailed guidance on housing mix on an area or site basis to be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAP's and Neighbourhood Plans. This will need to be clearly justified and have regard to both the local housing market characteristics and household requirements and the housing needs and strategic priorities of the wider housing market area.
- 5.3.127 Under Criterion D residential schemes which will support the strategic housing priorities identified in Policy HO8 will be encouraged. Where suitable and appropriate the Council will support diverse market housing products which can help meet a range of housing needs including low cost market housing, custom/self build and purpose-built privately rented homes. Low cost market housing will not be considered as affordable housing in relation to Policy HO11 and should be high quality as set out in Policy HO9.
- 5.3.128 To support custom/self build the council will consider the demand for people wishing to build their own homes. The Allocations DPD, AAPs and /or Neighbourhood Plans should consider mechanisms for meeting any local demand for such housing. This could include identifying opportunities offered by publicly owned land, identifying appropriate sites or requiring a proportion of self build plots to be provided on sites.
- 5.3.129 Larger sites of 0.4ha or 10 dwellings or more will be expected to include a proportion of accessible homes as part of the overall housing mix and should consider the provision of specialist housing for older people and people with disabilities.
- 5.3.130 To make the most efficient use of land and support density targets in Policy HO5 the provision of flats will be supported in the city and town centres and in areas well served by public transport and where they can contribute to an overall mix of housing on larger sites. Providing higher density flats in sustainable locations will help ensure housing growth is delivered in the most sustainable way and provide opportunities for city and town centre living to support the vitality and viability of the District's centres.
- 5.3.131 The provision of specialist accommodation, especially for older people, will be supported in suitable locations with good access to amenities and services and in areas of greatest anticipated demand. Specialist housing relates to the range of housing designed

specifically for the needs of older people. Examples include, but are not restricted to bungalows, sheltered housing, extra care, granny annexes, park homes, co-housing or retirement communities.

## **Housing Quality**

- 5.3.132 A key objective for the District is to ensure that new housing creates popular neighbourhoods with high standards of quality and design. It is important that new housing is designed to create high quality places where people aspire to live, which supports strong communities and healthy lifestyles, and responds to the impacts of climate change. Delivering a sufficient supply of high quality housing is critical to supporting economic growth and facilitating a low carbon economy.
- 5.3.133 In accordance with the Council's aim of increasing the quality and quantity of sustainable housing in the District, Policy HO9 will ensure that all new residential developments are:
  - high quality in terms of design and sustainable construction standards
  - adaptable to meet the needs of the district's diverse population
  - and help reduce the impact of future development on the environment
- 5.3.134 Policy HO9 aims to deliver high quality homes that meet the district's needs and sets out the quality of new housing that will be expected. In doing so Policy HO9 contributes to meeting Core Strategy Objectives 4, 10, 11 and 13.
- 5.3.135 Good design is a key aspect of sustainable development. The Local Plan seeks to achieve high quality and inclusive design and a good standard of amenity for all. Policy HO9 identifies the quality of housing required to help address the district's strategic housing market challenges and priorities.
- 5.3.136 The SHMA identifies the need and demand for housing and the needs of different groups in the district. Strategic housing market challenges and priorities identified for the District include:
  - addressing the requirements of a growing and ageing population
  - ensuring new housing supports the economy
  - delivering good quality homes to help attract and retain economically active households
  - maintaining the delivery of a variety of dwelling types and sizes to ensure that a better balance between demand and supply
  - addressing poor quality housing, overcrowding and improving energy efficiency
  - making urban neighbourhoods more attractive
- 5.3.137 Well designed homes can improve people's quality of life through the appearance and feel of the dwelling, the provision of private outdoor space, well laid out rooms and natural light. Homes which are designed to be adaptable can enable people to stay within their communities when their circumstances change such as having a family, growing old or developing a disability. A lack of space within homes has been shown to impact on basic lifestyle needs, as well as people's health, educational attainment and family relationships.

- 5.3.138 There is a need to ensure that the size of new homes is suitable to meet everyday needs and the requirements of households in the District. Building new houses to suitable space standards will ensure new homes are flexible, adaptable and fit for living and meet the requirements of households in the district including families, BME households and older people.
- 5.3.139 Mitigating and adapting to the impacts of climate change are key challenges for the District. The Bradford Climate Change Framework for Action identifies that significant carbon reductions are required to mitigate climate change impacts. The framework sets a target to cut district carbon emissions by 40% by 2020. The Local Plan will have a key role in meeting this target, including reducing carbon emissions from housing. To minimise the environmental impacts of significant housing growth it is important that the Core Strategy contains challenging but achievable sustainability standards for new housing.
- 5.3.140 Policy HO9 includes robust and comprehensive policies that set out minimum acceptable standards and criteria to be considered in the design and construction of new residential development in the District and identifies the size and quality of housing that is required. To support the move to a low carbon future and mitigate the impacts of climate change, Policy HO9 sets out sustainable construction standards for new housing in the District. These standards are consistent with the Government's zero carbon buildings policy and are based on national standards.
- 5.3.141 The sustainable housing and design standards in Policy HO9 have been assessed as part of the Local Plan Economic Viability Assessment. This includes the impact of space standards and design. Sustainable construction standards are identified as having an impact on plan viability. The standards in Policy HO9 are therefore set at a level to enable future housing development to be deliverable, and are subject to viability to respond to changing market conditions throughout the plan period.
- 5.3.142 Policy HO9 will help ensure that housing developments are of high quality and contribute to inclusive built environments in the District in support of Policy SC1. It will support the council's carbon reduction targets by ensuring that new housing is developed to high sustainable construction standards and contribute to Policy SC2. It will also help deliver an appropriate housing mix of housing types and tenures that meet local requirements in support of Policy HO8. Policy HO9 set out minimum acceptable standards and criteria to be considered in the design of new residential development in support of Policy DS1.

### **Policy HO9: Housing Quality**

A. New housing development should be high quality and achieve good design.

B. The Council will encourage and support new residential developments to achieve high sustainable design and construction standards. The minimum acceptable sustainable housing standards are set out in the Building Regulations.

C. Larger housing sites should include a proportion of new homes which are designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including older people and people with disabilities.

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D. New development should provide private outdoor space for homes, unless site constraints make this clearly unfeasible and/or unviable.

E. New homes should be well laid out internally and should provide suitable space standards appropriate to the type of home. Rooms should receive adequate levels of daylight.

F. New development should provide adequate storage for bins, recycling and cycles. These should be located or designed in a way which is both convenient for residents and supports the quality of the street scene.

G. Specific guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so.

| OUTCOMES                                                                                                                                                       | INDICATORS                                                                                                                                                | TARGETS                                                                                                                                 |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|--|
| Housing that is high quality<br>and achieves good design.<br>Housing that meets high<br>standards of environmental<br>performance as set out by<br>Government. | % of major housing schemes<br>achieving no reds in Building<br>for Life 12 Assessments<br>IND23(EV)                                                       | No planning<br>permissions for a<br>major housing scheme<br>should achieve a 'red'<br>rating against Building<br>for Life 12 assessment |  |
| Housing that is accessible<br>and easily adaptable<br>which caters for the needs<br>of the district's growing<br>population                                    | % of new dwellings achieving<br>optional technical standards<br>for accessible and adaptable<br>dwellings and wheelchair user<br>dwellings<br>Operational |                                                                                                                                         |  |
|                                                                                                                                                                |                                                                                                                                                           |                                                                                                                                         |  |
| LEAD ROLES                                                                                                                                                     | MAIN MECHANISMS                                                                                                                                           |                                                                                                                                         |  |
| CBMDC                                                                                                                                                          | Strategic policy via Local Plan Core Strategy                                                                                                             |                                                                                                                                         |  |

| CBMDC                | Strategic policy via Local Plan Core Strategy   |
|----------------------|-------------------------------------------------|
| Developers           | Development Management decisions                |
| Registered Providers | Pre application negotiations                    |
| HCA                  | Land allocations via Local Plan Allocations DPD |
| The Design Council   | AMR                                             |
| Leeds City Region    | SHMA                                            |
| Bradford Housing     | Viability Assessment                            |
| Partnership          | Building for Life                               |
| National Government  | Design review                                   |
| housing Standards    | Community led Neighbourhood Plans               |
|                      | Bradford Joint Housing Strategy                 |

- 5.3.143 Policy HO9 will be implemented through the Development Management process and supported by guidance set out in the Housing Design Guide SPD. The Housing Design Guide will set out further guidance on how the requirements of Policy HO9 should be met.
- 5.3.144 **Under Criterion A** all residential schemes will be expected to be high quality and achieve good design. The design quality of schemes over 10 units will be determined through a Building for Life 12 Assessment (or any subsequent revised national standard). A well designed scheme will perform well against all of the questions and the performance will be determined using a traffic light system of green, amber and red. In order to be considered good the scheme should achieve as many 'greens' as possible and avoid any reds unless clearly justified. Applicants for residential developments of over 10 units should submit their own evidenced Building for Life Assessment for consideration to form the basis for discussions on design quality.
- 5.3.145 This criterion should be read in conjunction with the following policies in the plan which support the Building for Life Criteria:
  - Policy TR2 Parking Policy
  - Policy TR3 Public Transport, Cycling & Walking
  - Policy HO8 Housing Mix
  - Policy DS1 Achieving Good Design
  - Policy DS3 Urban Character
  - Policy DS4 Streets and movement
  - Policy DS5 Safe and inclusive places
- **5.3.146 Under Criterion B** the Council will encourage developers to bring forward proposals which meet high standards of sustainable design and construction, which should meet at least the prescribed national standards at the time of application. New housing should achieve the Zero Carbon Housing Standard (or any national equivalent) in line with timescales set out in the national Zero Carbon Housing Policy.
- 5.3.147 The Council will encourage and support developments which exceed the national minimum sustainable housing standards, particularly efficiency standards. The Council will also support the use of on site renewable or low carbon energy generation, where appropriate and feasible, to help meet the energy requirements of the development and reduce carbon emissions.
- 5.3.148 The Council will encourage and support new homes which are designed to provide enhanced accessibility or adaptability. This includes accessible and adaptable dwellings and wheelchair user dwellings, as set out in the national Optional Technical Standards for Housing. In addition the Council will support the Lifetime Homes Standard as a model for building accessible and adaptable homes.
- **5.3.149 Under Criteria C** larger sites of ten dwellings or more should include a proportion of accessible homes as part of the overall housing mix. This will be assessed through evidence provided by the applicant that a proportion of new homes on a site will exceed the national minimum requirement for access. If these standards are not met, this should be clearly justified and the applicant should demonstrate how the development meets the requirements of Criterion C. In considering Criteria C regard will be had to local need and the viability and feasibility of delivering accessible homes on a particular site. Site specific

factors such as vulnerability to flooding, the topography of the site or other circumstances which may make a site less suitable for accessible dwellings will also be taken into account, particularly where step free access cannot be achieved or is not viable.

- 5.3.150 The council intends to undertake further detailed work in regards to the requirement for accessible, adaptable and wheelchair user dwellings in accordance with the latest National Planning Practice Guidance. The Housing Design Guide will take account of this work and provide further guidance in relation to the proportion of accessible, adaptable and wheelchair user dwellings required in advance of any adopted policy in the Local Plan.
- 5.3.151 **Criterion D** relates to private outdoor space including gardens, balconies, patios and communal spaces. Spaces should be directly accessible from the home, secure, defensible and receive adequate sunlight.
- 5.3.152 The provision of sufficient living space within new homes is an important element of good housing design. Building to suitable space standards will ensure new homes provide sufficient space for everyday activities. Homes can also be used more flexibly and adapted more easily by their occupants to changing life circumstances.
- 5.3.153 **Under Criterion E** new homes should provide suitable space standards which will provide sufficient space for everyday activities.
- 5.3.154 The Government has developed a national space standard to offer a consistent set of requirements with regard to the size of new homes. The overall objective of this national space standard is to ensure that new homes are highly functional in terms of meeting typical day to day needs at a given level of occupation. The standard is intended to be a minimum standard which developers should exceed where possible.
- 5.3.155 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.
- 5.3.156 Where feasible and / or viable new homes should meet at least the minimum internal floor areas as set out in the Nationally Described Space Standard (or any subsequent national space standards).
- 5.3.157 If the proposed space standards are below those set out in the nationally described space standard then the onus will be on the applicant to justify why development to these standards cannot be achieved.
- 5.3.158 The Council intend to undertake further detailed work in regards to adopting the national space standard in the District, in accordance with the latest National Planning Practice Guidance, in advance of any policy requirement in the Local Plan.
- 5.3.159 Whilst new residential development should incorporate sufficient space in line with the identified standards, regard should also be had to the layout and function of units provided. Rooms will be expected to receive adequate levels of daylight and ventilation appropriate to their use.

- 5.3.160 **Criterion F** seeks to ensure that suitable provision is made for the proper storage of waste in new homes. New development should provide external storage space for bins and recycling which is convenient and does not reduce the quality of the street scene. Cycle storage should be accessible and secure. Schemes should achieve a 'green' for Question 12 of Building for Life 12 to accord with this criterion.
- **5.3.161 Criterion G** allows for further guidance on housing quality and design on an area or site basis to be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAP's and Neighbourhood Plans. The nature of some sites and areas in terms of their location, viability and impact upon the environment, mean that higher standards of sustainable design and construction standards may be possible. Where appropriate higher levels of sustainable design and construction standards will be considered on specific sites or areas, where this is feasible and viable.

### **Overcrowding and Vacant Homes**

- 5.3.162 One of Bradford's most pressing housing challenges is overcrowding. It is well documented that overcrowding is not just a housing issue it directly contributes to poor health and poor educational attainment and seriously damages quality of life for the families and households affected.
- 5.3.163 Approximately 10% of households in the District have at least one room too few in relation to their household size according to the 2011 Census (using the Occupancy Rating), 4,523 more households than in 2001. Moreover 3% of households would be classed as severely overcrowded with at least two rooms too few.
- 5.3.164 Severe overcrowding is concentrated in Great Horton, Manningham and Barkerend.
- 5.3.165 At its most basic level, rising rates of overcrowding are a symptom of lack of availability and choice of more suitable housing. Therefore, the key way in which overcrowding will be successfully tackled is through the increase in housing supply set out in this Core Strategy. However, making better use of existing stock i.e. bringing empty homes back into use and reducing under-occupation is also a priority. Under-occupation/making best use of stock are key national government priorities.

### **Policy HO10: Overcrowding and Empty Homes**

The Council will work with stakeholders and use its plans, programmes and strategies to make best use of and improve the quality of the existing housing stock. In particular the Council will seek to address the problems of overcrowding and the number and proportion of empty homes.

Policy interventions and investment priorities will be set out within the Council's District Housing Strategy, the Council's Empty Homes Delivery Plan, its Neighbourhood Development Frameworks, Neighbourhood Action Plans and within a Householder SPD.

|         | OUTCOMES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | INDICATORS    | ;                                            | TARGETS                            |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------------------------------------|------------------------------------|
|         | Problems related to<br>overcrowding have been<br>reduced and alleviate<br>by increasing housing<br>supply and by enabling<br>better matching of housing<br>provision and housing need<br>across the existing housing<br>stock.<br>Empty homes brought back<br>into use                                                                                                                                                                                                                                                                                                                         |               | ercrowding and<br>and the length<br>ave been |                                    |
|         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |                                              |                                    |
|         | LEAD ROLES<br>CBMDC<br>Developers – market housing<br>InCommunities<br>Other RSL's – social housing<br>HCA<br>Government                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               | Local policy and<br>Householder SF           | via Core Strategy<br>I allocations |
| 5.3.166 | In addition to measures taken to<br>will aim to build upon a number<br>adopted with partners including:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |                                              |                                    |
|         | Making best use of under-occupied socially rented stock using allocations policies an<br>working with registered providers, particularly linking in with measures to address the<br>impacts of welfare reform;                                                                                                                                                                                                                                                                                                                                                                                 |               |                                              |                                    |
|         | <ul> <li>Offering a 'housing options' casework approach to overcrowded households;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               |                                              | ed households;                     |
|         | Increased priority awarded to<br>allocations policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | severely over | crowded househo                              | lds in the District's              |
| 5.3.167 | Whilst the primary tools for dealing with overcrowding are those summarised above, planning policy also has a role to play, both in relation to facilitating and supporting the strategic objective to increase housing supply, and at a local level by supporting home-owners who have the financial means and may wish to resolve their overcrowding problems through extending their homes to create extra bedrooms. This is especially relevant in Bradford: the 2011 census showed that 5.6% of owner-occupiers in the District are overcrowded, compared to 3.3% for England as a whole. |               |                                              |                                    |
| 5.3.168 | Additionally, in response to changes in national policy and taking account of local circumstances the Council has completed a review of its supplementary planning guidance on Householder development. The new Householder Supplementary Planning Document has replaced the two previous guidance documents, one on House Extensions and the                                                                                                                                                                                                                                                  |               |                                              |                                    |

second on Dormer Windows. In an effort to contribute towards the overcoming of this issue, the Householder SPD allows Planning Officers to take into account the specific issue of the overcrowding an applicant's current household maybe suffering from.

- 5.3.169 In cases where overcrowding has been established through the submission of documented evidence by the applicant and through consultation with the Council's Housing Department, the Council will normally allow a larger than otherwise permitted extension under the Design Principles of the Householder SPD. This will only be permitted if the additional extra volume would alleviate the established overcrowding in the household, which an extension under the Design Principles of the SPD would not allow. The larger than otherwise permitted extension must also not have a significant detrimental impact upon the neighbouring properties occupants and are still subject to Design Principles 1, 2, 3, 4, 5 in Section 2 and Design Principles 4, 5 and 6 in Section 6 of the Householder SPD.
- 5.3.170 Given the scale of population increase expected during the plan period and the over crowding problems outlined above, it is vital that significant progress is made in tackling and reducing the number of empty homes across the District. While there will always be a significant number of empty homes at any one time due to market churn (short term vacancy due to the sale, transfer and re-letting of properties) the number of empty homes, particularly long term empty homes in the District is too high. The total number of empty homes at October 2012 was 9,731 (4.6% of the total district stock) of which 5,413 were empty for longer than 6 months.
- 5.3.171 The Council is therefore keen to reduce the number of empty homes across the whole District and in the process reduce the environmental and social problems which can occur where such properties become a magnet for vandalism, graffiti and anti-social behaviour.
- 5.3.172 Many empty or derelict houses can be helped back into occupation simply by giving advice and information to the owner. A range of advice and assistance options are made available by the Council and its partners to help owners of empty homes bring them back into use. The Council has a dedicated Empty Homes Team to help target empty homes, focusing in particular on long-term empty homes. The range of support made available for empty home owners includes:
  - Empty home loans and assistance
  - Legal assistance
  - Specialist empty homes advisors
- 5.3.173 The Council also has a range of enforcement options it can use if owners of empty homes refuse to take steps to bring their properties back into use. These include:
  - Compulsory Purchase The Council buys the property without consent of the owner and sells it on for redevelopment and reoccupation
  - Enforced Sale The Council forces the sale of the property to recover a debt which exists against the property
- 5.3.174 The Council will only consider these enforcement options as a last resort. They are costly, complicated and time consuming. It is preferable for all parties if the owner takes steps to bring the property back into use without the Council having to resort to enforcement action.

## **Affordable Housing**

- 5.3.175 Access to affordable housing is a major issue in the District. Inaccessible home ownership and housing benefit reform is making housing less affordable for many households. Strategic aims for the Council are to ensure an adequate supply of affordable homes to buy or rent that match household incomes, build sustainable neighbourhoods by ensuring that new homes of the right type are built in the right location, and to support the economy by new home building and ensuring homes remain affordable.
- 5.3.176 Policy HO11 will aim to ensure that a sufficient supply of good quality affordable housing is delivered to meet the affordable housing needs of the District. Policy HO11 supports Core Strategy Objectives 2, 4 and 10.
- 5.3.177 House prices in the District increased considerably between 2001 and 2008. Since peaking in 2008 prices have fallen back, mirroring the regional trend. While house prices have theoretically become more affordable in recent years, home ownership has remained out of reach for many potential first-time buyers, most who still aspire to home ownership. The average house price across the District is lower than the national and regional average. However, although average house prices are below national and regional levels the District also has lower average incomes. Within the District there are considerable variations in house prices and affordability. House prices are highest in Wharfedale, then Bingley and Shipley and lowest in inner Bradford and the urban area of Keighley. House price affordability ratios vary across the District, with Wharfedale having affordability ratios similar to the least affordable areas in the region such as North Yorkshire.
- 5.3.178 In comparison to regionally or nationally, Bradford District has a low proportion of social housing (15% of total housing stock). Despite the delivery of new affordable homes the overall amount of social homes has remained relatively static over the last decade largely due to the loss of social housing through Right to Buy and demolitions of low demand/poor quality stock. The number of households renting from a private landlord in the District has increased significantly over the last decade. The private rented sector serves a variety of markets in the District, including housing for low income households through the support of Housing Benefit. However, there are issues associated with insecure tenancies and housing standards.
- 5.3.179 The Local Plan must meet the full objectively assessed need for affordable housing in the housing market area. Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.
- 5.3.180 The council has prepared a SHMA to assess affordable housing need in the District. Evidence in the SHMA justifies the need for affordable housing. The latest assessment identifies shortfalls in affordable housing across the District and estimates an overall net annual requirement for approximately 587 new affordable homes. Based on this need the SHMA recommends a district-wide affordable housing target of 20% to 25%. The SHMA also provides an analysis of the tenure, type and size requirements for affordable housing.
- 5.3.181 Policy HO11 sets out when affordable housing contributions will be required and the proportions of affordable housing which will be sought across the District to help meet the overall need for affordable housing. As well as housing need, the targets and thresholds in Policy HO11 are based on a range of considerations including affordability, viability and delivery of affordable housing through other sources.

- 5.3.182 The requirements and thresholds for affordable housing have been assessed in terms of economic viability. The assessments identify geographical differences in viability across the District and that the deliverability of affordable housing through developer contributions is challenging in some parts of the District. To ensure viability, the requirements and thresholds for affordable housing in Policy HO11 are set at a level to enable future housing development to be deliverable. The affordable housing targets are subject to viability and the policy is flexible to respond to changing market conditions throughout the plan period.
- 5.3.183 Policy HO11 seeks to address local housing need in rural areas, through rural exception sites where appropriate.
- 5.3.184 Policy HO11 will enhance the role of the District within the wider Leeds City Region as an important business location with a good supply of affordable housing in support of Policy SC1.It will also help to ensure that the plan meets the full need for affordable housing in the District in support of Policy HO1 and the delivery of a mix of housing in terms of price and tenure in support of Policy HO8. The targets in Policy HO11 are subject to viability as set out in policy ID2.

### Policy HO11: Affordable Housing

A. The council will work with partners to ensure that there is a sufficient supply of good quality affordable housing distributed throughout the District, particularly in the areas of highest need.

B. Subject to viability, the Council will negotiate for up to the following proportions of affordable housing on residential developments:

- Up to 30% in Wharfedale
- Up to 20% in towns, suburbs and villages
- Up to 15% in inner Bradford and Keighley

Affordable housing should be provided on-site and be indistinguishable from and well integrated with market housing, unless off-site provision or a financial contribution can be robustly justified and would support the creation of inclusive and mixed communities.

C. Affordable housing will be required on developments of 15 units or more. The site size threshold is lowered to 11 units or more in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley.

D. The Council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability.

E. Where an applicant can provide robust, up to date and verifiable evidence to support the view that a site would be unviable if affordable housing targets are required then the exact amount of affordable housing, or financial contribution to be delivered, will be determined by economic viability having regard to individual site and market conditions. ....>

#### **Rural Affordable Housing**

F. Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.

G. The criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the Allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the green belt.

| OUTCOMES                                                                                                                         | INDICATORS                                                                                                                                                                                              | TARGETS                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| Sufficient affordable<br>housing of the right size,<br>type and tenure has been<br>provided to meet the<br>needs of the district | Annual gross affordable<br>housing completions – district<br>wide, by DPD area and by<br>settlement<br>Corporate<br>IND5(H)<br>Number of dwellings completed<br>on rural exception sites<br>Operational | 20- 25% of total gross<br>housing completions<br>should be affordable<br>housing completions |
|                                                                                                                                  |                                                                                                                                                                                                         |                                                                                              |
| LEAD ROLES                                                                                                                       | MAIN MECHANISMS                                                                                                                                                                                         |                                                                                              |
| CBMDC<br>Developers<br>Registered Providers<br>HCA<br>Leeds City Region                                                          | Strategic policy via Local Plan Co<br>Local policy and allocations via L<br>Neighbourhood Plans<br>Development management decis<br>Pre application negotiations<br>SHMA<br>AHEVA                        | ocal Plan and                                                                                |

5.3.185 To meet the identified need for affordable housing in the District the Council will aim to ensure that 20 to 25% of the total housing delivery is affordable housing. The Council will aim to achieve this target by utilising funding sources to support the delivery of affordable homes, maximising opportunities offered by council owned land and through developer contributions.

## 5.3.186 Given pressures upon development viability in parts of the main urban areas in order to meet the overall district wide affordable housing target, grant funding and any other forms

of subsidy and funding for affordable housing should be directed towards development in the areas of highest need.

- 5.3.187 The Council will seek affordable housing from residential developments in accordance with the stated thresholds and percentages as set out in Policy HO11. Figure HO2 shows the areas that the policy and the thresholds will apply to. This equates the following quotas:
  - Wharfedale up to 30%
  - Towns, suburbs and villages up to 20%
  - Inner Bradford and Keighley up to 15%
- 5.3.188 Within Wharfedale and the villages listed in Part C of Policy HO11 affordable housing contributions will be required on developments of 11 units or more or which have a maximum combined gross floorspace of more than 1000sqm, in accordance with the minimum threshold for affordable housing contributions as set out in the National Planning Practice Guidance.
- 5.3.189 Policy HO11 will be applied to developments which have been manipulated in size (either in area or yield) in an attempt to avoid the provision of affordable housing, or which constitute piecemeal development. On smaller sites a commuted sum may be appropriate where this is justified by viability issues.
- 5.3.190 The Council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure. The final mix should have regard to the evidence of the SHMA, site suitability and any other relevant, robust and up to date evidence of local needs and/or economic viability. The Council's preferred tenure mix of 70:30 social/affordable rent: intermediate will be the starting point for all affordable housing negotiations.
- 5.3.191 The economic viability and circumstances of individual sites will be taken account of in the determination of the affordable housing contribution being sought. Where an applicant can provide evidence that a site would be unviable if affordable housing targets are required then the exact amount of affordable housing, or financial contribution, to be delivered will be determined by economic viability having regard to individual site and current market conditions. In such cases the Council will expect a full development appraisal to be submitted for validation as set out in Policy ID2.
- 5.3.192 The evidence of affordable housing need as set out in the SHMA and the likely overall restraint on housing development in the smaller and rural settlements of the District means that the Council and /or Neighbourhood Plans will need to consider allocating rural exception sites. The Core Strategy can be no more precise at this stage since the allocation of such sites will be a finely balanced decision based on the need for such housing and the number, type and environmental sensitivity of candidates for rural exception sites. In some cases there may be sufficient land within settlements to meet need without resorting to areas covered by policies which normally protect land from development, in others there might not.
- 5.3.193 The Allocations DPD will include a policy setting out the framework within which speculative planning applications for rural exceptions sites on non allocated sites will be judged. The priority will be to ensure that those areas which are most sensitive and most crucial to the maintenance of a robust green belt are protected.



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## Gypsies, Travellers and Travelling Showpeople

- 5.3.194 It is clearly established within the Government guidance contained within 'Planning Policy for Traveller Sites' that the planning system has a crucial role and responsibility to ensure that adequate provision is made for the accommodation needs of travellers. Local planning authorities are required to set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area.
- 5.3.195 The Core Strategy therefore assesses both current supply and future need for accommodation by reference to the recently completed 'Gypsy and Traveller Accommodation Assessment' of July 2015 and provides a framework to ensure that the sites which will be identified in forthcoming DPD's meet in full the needs of the community and are in locations which are accessible to key services and facilities such as education thereby enhancing their quality of life.
- 5.3.196 The Bradford Gypsy and Traveller Accommodation Assessment completed by consultants arc4, has utilised a variety of primary and secondary data and research to assess the scale and type of need including current unmet need, need from households who currently reside in bricks and mortar accommodation, and need resulting from future household growth which is linked to the age structure of current households and finally need for transit accommodation.
- 5.3.197 Based on the results of the Assessment it appears that there will be a need for a range of site types, tenures and locations including both private and public / social provided accommodation. The Council will therefore work closely with local communities in developing the site allocating elements of the Local Plan to ensure that sites and locations are both sustainable and best meet the needs of travellers and showpersons.
- 5.3.198 Government policy states that Local Planning Authorities should assess the need for transit site accommodation in addition to permanent accommodation. Such provision can support the community's lifestyle by providing temporary places to stop while travelling. Utilising data from past patterns of unauthorised encampments and information from stakeholder and household survey returns, the Gypsy and Traveller Accommodation Assessment has identified the need for 7 transit pitches with total capacity for 14 vehicles / homes. There are a number of models and options for providing for such transit need including that of Negotiated Stopping which is currently used in other parts of the region such as Leeds. The Council will work with local communities and neighbouring authorities to determine the best model and best locations for transit provision.
- 5.3.199 Table HO8 sets out the requirement for accommodation in the district based on the results of the Assessment.

### **SECTION 5.3 Planning for People - Housing**

# Table HO8: Pitch and Plot Requirements in Bradford District based on theBradford Gypsy & Traveller Accommodation Assessment 2015

| Gypsy's and<br>Travellers | Need (2014-19)                               | 82 pitches |
|---------------------------|----------------------------------------------|------------|
|                           | Supply of authorised pitches                 | 52 pitches |
|                           | Shortfall / additional supply needed 2014-19 | 30 pitches |
|                           | Longer Term Need (to 2030)                   | 9 pitches  |
|                           | Total Additional Supply Needed               | 39 pitches |
| Transit Provision         | Total Additional Supply Needed               | 7 pitches  |
| Showpersons               | Need (2014-19)                               | 68 plots   |
|                           | Supply of authorised plots                   | 36 plots   |
|                           | Shortfall / additional supply needed 2014-19 | 32 plots   |
|                           | Longer Term Need (to 2030)                   | 13 plots   |
|                           | Total Additional Supply Needed               | 45 plots   |

### **Policy HO12: Sites For Travellers and Travelling Showpeople**

A. The Council will make provision via policies and site allocations to deliver at least the following number of additional pitches for Gypsies and Travellers and plots for Travelling Showpeople for the period to 2030:

- **39** pitches for the gypsy and traveller communities;
- **7** pitches for transit accommodation;
- **45** pitches for travelling showpeople.

B. The Allocations DPD and Shipley & Canal Road AAP will in combination allocate sufficient sites to deliver this requirement in sustainable and accessible locations which meet the needs of local communities;

C. The Council will work closely and constructively with the neighbouring councils, the traveller and showperson's communities and the settled community to identify the most appropriate sites which will offer locations and accommodation which are both sustainable and meet the needs of the travellers and showpeople;

D. All sites which are developed or proposed for allocation for the gypsy and traveller and travelling showpeople communities should be assessed against criteria relating to:

Safe and appropriate access to the highway network;

- Whether they are or can be served by utilities or infrastructure;
- Whether they are accessible to services, amenities and public transport;
- The avoidance of significant adverse affects on the environment and adjacent land uses; and
- Incorporating appropriate design and landscaping standards
- Avoiding areas at high risk of flooding.

E. Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.

F. The criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the Allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the green belt.

| OUTCOMES                                                                                                                                                                                                                                                                            | INDICATORS                                                                                                                                                                                                       | TARGETS                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Sufficient new<br>accommodation for<br>Gypsies and Travellers<br>and Travelling Showpeople<br>of the right size, type and<br>tenure has been provided<br>to meet the needs of local<br>communities as set out in<br>the Bradford Gypsy and<br>Traveller Accommodation<br>Assessment | The land supply of sites for<br>Travellers and Travelling<br>Showpeople<br>IND7(H)<br>Annual gross pitch<br>completions – district wide<br>split between G&T pitches<br>and pitches for Travelling<br>Showpeople | A deliverable five year<br>land supply of sites for<br>Travellers and Travelling<br>Showpeople |

| LEAD ROLES                                                                                                                                                         | DELIVERY MECHANISMS                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CBMDC<br>Developers – market<br>housing<br>InCommunities<br>Other RSL's – social<br>housing<br>HCA<br>Government<br>Local Community Groups<br>including Leeds GATE | Strategic Policy via Core Strategy<br>Local policy and allocations<br>Development Management Decisions<br>Gypsy and Traveller Accommodation Assessment<br>AMR |
|                                                                                                                                                                    |                                                                                                                                                               |

5.3.200 The policy as proposed gives sufficient guidance to other site specific Local Plan documents and could be easily updated should new or updated evidence on accommodation needs be produced in the future. By identifying criteria which could be

equally applied to applications for planning permission as for the Local Plan site selection and allocation process, the preferred policy would enable the Council to respond to any proposals for site developments which might come forward in the short term.

5.3.201 The policy allows for the inclusion within the Local Plan, should the evidence justify it, of rural exception sites and policies.

### **Key Linkages for Housing**

#### EVIDENCE

- Strategic Housing Market Assessment 2010 and Update 2013
- Strategic Housing Land Availability Assessment 2011 and 2013 Update
- Housing Requirement Study
- Growth Study
- Affordable Housing Economic Viability Assessment
- Local Plan Viability Assessment
- The Bradford Climate Change Framework for Action
- District Housing Strategy
- Housing Strategy for the Over 50s
- Tackling Empty Homes in the Bradford District: Delivery Plan 2011-2014

| Paragraph<br>Nimber | NPPF Statement                                                                                                                                                                                             | CS<br>Policies              |
|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| 7                   | The 3 dimensions to sustainable development - supporting<br>strong, vibrant and healthy communities, by providing the supply<br>of housing required to meet the needs of present and future<br>generations | HO1 HO2<br>HO3 HO10<br>HO11 |
| 14                  | Local planning authorities should positively seek opportunities to meet the development needs of their area                                                                                                | HO1 HO2<br>HO3 HO4          |
| 14 and 47           | local planning authorities should use their evidence base to<br>ensure that their Local Plan meets the full, objectively assessed<br>needs for market and affordable housing;                              | HO1 HO2<br>HO3 HO11         |
| 17                  | encourage the effective use of land by reusing land that has been<br>previously developed (brownfield land), provided that it is not of<br>high environmental value                                        | SC5 HO4<br>HO6              |
| 47                  | boost significantly the supply of housing;                                                                                                                                                                 | HO1 HO2                     |

| 47        | set out their own approach to housing density to reflect local circumstances                                                                                                                                                                                                                                                                | HO5              |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| 50        | plan for a mix of housing based on current and future<br>demographic trends, market trends and the needs of different<br>groups in the community                                                                                                                                                                                            | HO1<br>HO8       |
| 50        | Deliver a wide choice of high quality homes                                                                                                                                                                                                                                                                                                 | HO1<br>HO8 HO9   |
| 50        | Where affordable housing is needed, set policies for meeting this need. Such policies should be sufficiently flexible to take account of changing market conditions over time.                                                                                                                                                              | HO11             |
| 51        | identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies                                                                                                                                                                                                              | HO10             |
| 52        | planning for larger scale development, such as new settlements<br>or extensions to existing villages and towns where such<br>opportunities provide the best way of achieving sustainable<br>development                                                                                                                                     | HO2              |
| 53        | planning for the housing needs of rural communities including rural exception sites where appropriate.                                                                                                                                                                                                                                      | HO11             |
| 55        | in rural areas housing should be located where it will enhance or maintain the vitality of rural communities.                                                                                                                                                                                                                               | HO3 HO11         |
| 56        | Good design is a key aspect of sustainable development; It is<br>important to plan positively for the achievement of high quality and<br>inclusive design for all development                                                                                                                                                               | HO9              |
| 70 and 72 | deliver the social, recreational and cultural facilities and services<br>the community needs / ensuring that a sufficient choice of<br>school places is available to meet the needs of existing and new<br>communities                                                                                                                      | HO4              |
| 83        | Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan                                                                                                                                                                                                              | HO1, HO2,<br>HO3 |
| 101       | the Sequential Test is to steer new development to areas with the lowest probability of flooding.                                                                                                                                                                                                                                           | HO2, HO3<br>HO7  |
| 111       | Planning policies should encourage the effective use of land by re-<br>using land that has been previously developed (brownfield land),<br>provided that it is not of high environmental value. Local planning<br>authorities may continue to consider the case for setting a locally<br>appropriate target for the use of brownfield land. | HO6<br>HO7       |
| 157       | Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon                                                                                                                                                                                                                                            | HO1              |
|           |                                                                                                                                                                                                                                                                                                                                             |                  |