

Q and A Responses - Session 3: Housing – 2nd March 2021

Session Questions / Matters Raised	Response
Object to consultation during lockdown	<p>The Council appreciates the challenges presented by carrying out and responding to consultation during the lockdown. However, the Government has made it clear in guidance to Local Planning Authorities that local plan preparation and consultation must continue and the Government has made specific changes to the Development Plan Regulations to allow for that. The Council has taken actions to support and assist local communities – in addition to the online engagement events such as this, officers are available by telephone or e-mail to answer queries. Paper copies of documentation are available in some circumstances. The Council are encouraging representations to be made via its online portal however comments can also be submitted by post or e-mail. There is extensive information available on the Council's web pages.</p>
<p>Can you explain the flood zone criteria and can you explain why some sites have been removed from this iteration of the plan particularly the two in Eldwick off Pengarth and Sherriff Lane.</p>	<p>Flood zones indicate the level of risk of sea or river flooding. All areas lie within either flood zones 1, 2 or 3. Flood zone 3 is sometimes split into 3a and 3b.</p> <p>Areas within flood zone 1 are assessed as having lowest flood risk i.e. less than 1 in 1,000 annual probabilities, flood zone 2 refers to areas with between 1 in 100 and 1 in 1,000 annual probabilities of flooding and flood zone 3 are areas at highest risk at greater than 1 in 100.</p> <p>The Council has published a Strategic Flood Risk Assessment (SFRA) which has informed the overall strategy and site allocations and will be doing further more detailed flood risk assessment work ahead of finalising the plan. The vast majority of preferred option sites lie within flood zone 1. All sites also have to be assessed to see if they would be subject to other sources of flooding i.e. groundwater flooding.</p> <p>With regard to rejected sites – the Council has published a separate paper entitled Site Assessment and Rejected Sites'. It describes the overall site assessment methodology and also its the rejected sites and summarises the reasons for their rejection. Bingley sites are covered in the Appendix, page 21. Assuming the specific sites, you are referring to are BI/051 and BI/018 – BI/051 has been rejected as it is understood that the land is not available for development and BI/018 is considered to lack a suitable access and would also cause unacceptable landscape, wildlife and heritage impacts.</p>

Chat platform set-up and why not open to all.	<p>The zoom meetings and the settings have been set to facilitate an ordered presentation, exchange of views and q&a. The chat function has been set so that questions to be forwarded to officers in a way which doesn't cause distraction for other users.</p>
How much thought and planning has been given to infrastructure and in particular community facilities, so we don't make the same mistakes of the past building sole-less housing estates with no facilities for children, teenagers etc and things like community buildings and shops, etc	<p>The Council appreciates the importance of assessing and facilitating the provision of improved services and infrastructure to match the proposals for housing and economic growth. It is involved in an ongoing process of liaison and discussion with service providers and utility companies including close working internally with the Council Education Service. A Local Infrastructure Plan has been produced and is available on the Local Plan website.</p> <p>It should also be stressed that more work will be done between now and the finalisation of the plan in about a years' time. This will include using transport modelling to assess the impact of proposals in the highway network and to formulate proposals where necessary for road and public transport improvements.</p> <p>With regards to larger development sites the Council will be undertaking further master planning work to ensure that development creates healthy and vibrant places, and good design which addresses matters such as provision for recreation, open space and services.</p> <p>The plan also includes a range of policies which seek to promote high quality and innovative design.</p>
For housing standards has thought been given to ensuring eco-friendly carbon neutral homes. Example Basildon Methodist Centre – Passivhaus standards and has no energy bills.	<p>The council have set out in policy HO9 Housing Standards that it will seek to achieve high construction and energy efficient standards in line with the Government's Future Homes Standard, and support and encourage new developments which exceed the minimum standards where possible, with all homes to be highly energy efficient, with low carbon heating and be zero carbon ready by 2025.</p> <p>This is in accordance with NPPF para 150 where any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.</p>
Definition of LGC and LSC – or signpost to definitions.	<p>There is no specific definition in the Local Plan of a Local Growth Centre or Local Service Centre. However, the placement of towns and villages within the settlement hierarchy is based on their size, role, function and relationship with adjoining areas and their connectivity by road and public transport to adjoining areas.</p> <p>The use and articulation of a settlement hierarchy in guiding and controlling the distribution of growth and development is a well-established planning tool with its roots in the RUDP and historically the Regional Spatial Strategy (RSS) and plays a major role in establishing a sustainable pattern of growth and development across the district.</p>

	<p>While broadly in line with the approach of the RSS, the adopted Core Strategy made some adjustments to the overall settlement hierarchy approach to include Bingley as a Principal Town and introduced a tier of 'Local Growth Centres' between the Principal Towns and much smaller Local Service Centres following a detailed settlement study and the practicalities of the land supply situation at the time.</p> <p>The placement of a settlement within a tier of the hierarchy does not directly lead to the assignment of a minimum level of new housing development as the circumstances within each one and the available land supply vary considerable.</p>
Small sites and approach to.	The Council appreciates the role that small sites can play in meeting housing need, diversifying the housing offer and making effective use of brownfield sites. Within the Local Plan the threshold for inclusion of sites has been reduced to just 0.2ha or 5 units – this compares to 0.4ha in the RUDP. Government guidance within the NPPF indicates that at least 10% of the housing requirement should be met from sites no larger than 1ha. The Plan more than meets this benchmark - it identifies and allocates 193 small sites amounting to over 18% of the district wide housing requirement.
Higher flood zone more risky or lower rate.	Flood zones are defined on the basis of the frequency or likelihood of an area being subject to sea or river flooding. Flood zone 1 is the lowest risk of flooding whereas flood zone 3 is the highest probability of flooding. For areas within Flood zone 1 the likelihood of flooding on an annual basis is stated to be less than 1 in 1000.
When will the next school organisation plan be produced	The School Organisation Plan is currently being reviewed and will be published later this year as a new document combining School Organisation, Childcare Sufficiency and SEND (special educational needs and disabilities) Sufficiency planning.
LP is a city centre plan and not a district plan and Wharfedale and Keighley numbers have been reduced and city centre is increased at a time when evidence indicates that city centre demand is falling. People want some more suburban settings and the LP needs to be out of step or is there an	<p>The plan does promote growth within the City Centre however it is providing for around 19,000 homes (approximately ¼ of the district wide quantum) outside of the City Centre area so it is not accurate to characterise it in those terms.</p> <p>The Council considers that its approach to the distribution of housing growth aligns with government priorities and guidance which is to maximise development in and around city centres and public transport hubs. These are predominantly the most sustainable locations for growth. The plan does provide for significant growth in more 'suburban' locations including the release of land for over 5,000 new homes in the green belt. However further development in peripheral locations is neither possible given the land supply options and environmental constraints nor desirable in terms of the need to promote sustainable development patterns which reduce the need to travel. It is</p>

acceptance that an ambitious LP is too difficult to deliver.	also important that the Local Plan's housing growth proposals support and reflect the opportunities provided by transformational projects and investments which are planned in the area.
What influence does the council have with delivery over the type and quality of housing?	<p>The Council has included policies within the Local Plan, to ensure that sites deliver a mix of house types (Policy HO4), the provision of affordable housing (Policy HO5), specialist housing such as for older people and for custom and self-build (Policies HO7 and HO6),and for travellers and show people (Policy HO8).</p> <p>Policy HO9 sets out criteria to ensure certain minimum housing standards are met, and the Council has produced a Homes and Neighbourhood Housing Design Guide Supplementary Planning Document (SPD).</p> <p>All of these policy tools are aimed at driving up standards and achieving an appropriate mix in terms of type, size and tenure of housing to meet identified needs and will be used when determining planning applications.</p>
The balance between housing and employment sites / levels is wrong	<p>The level of housing and employment and housing land release reflects the evidence base and in particular the SHMA, the Housing Need Addendum Report, and Employment Needs Assessment.</p> <p>The Council is committed to supporting economic growth and regeneration across the district and its recovery from the impacts of the pandemic. The Local Plan provides for at least 72ha of new employment land (Policy SP6), defines and protects enterprise zones, employment zones and Business Development Zones (Policy EC2) and supports area based regeneration proposals in the City Centre and Southern Gateway, the Shipley and Canal Road Corridor, in Shipley and in Keighley. Policy (EC3) in the plan also focuses upon linking skills and employment development to growth.</p> <p>The Council accepts that the current uncertainty relating to economic growth and recovery post pandemic and will adjust its policies and proposals should new evidence emerge. The technical evidence underpinning the plan's economic policies takes a cautious approach but has built in a 'buffer' to the employment land calculations in light of the current macro-economic uncertainties.</p> <p>In evaluating the balance between housing and economic growth this is explored in further detail in the technical evidence detailed below:</p> <p>Future Employment Analysis Paper 2021 (bradford.gov.uk)</p> <p>Bradford - Updating the Demographic Evidence Report 2021</p>

Very positive to hear the policies about the quality of housing – how are you going to ensure that this is achieved. The main developers just produce housing of poor quality with snagging problems.	<p>See the answer above. The Local Plan includes a suite of policies aimed at ensuring housing mix and housing quality and these policies are in addition to the Homes and Neighbourhood Housing Design Guide Supplementary Planning Document (SPD) which the Council has already published.</p> <p>Issues in terms of build quality are generally covered through the building Regulations which are separate to the planning regulations.</p>
Ilkley needs properly affordable homes but developers often go for 9 unit developments – how can the council work with communities to overcome this.	<p>It is not acceptable for sites to be manipulated or sub divided in order to artificially reduce yields in an attempt to avoid affordable housing contributions. This is made clear within the adopted Core Strategy (see paragraph 5.3.189). Planning applications can be refused in such circumstances. However, there will be occasions where there are legitimate reasons why site yields are lower than expected due to on site constraints or design considerations.</p> <p>The council will consider ensuring that this is reflected in the policy/supporting text of policy HO5 affordable housing.</p>
How will self-builders afford the land to self-build – the price of land may be prohibitive for small builders.	The council will support self builders by requiring developers to supply at least 5% of the dwelling plots for sale to self-builders on larger sites over 100 units and utilising council owned land where appropriate. The draft local plan currently does not include detailed provisions for self build plots to be 'affordable'. Detailed mechanisms for ensuing self build land is affordable may be more appropriate to be set out in supplementary planning guidance or through specific schemes.
Where can I find the future homes standard regulations	<p>Further details of the Government's future homes standard consultation can be found here:</p> <p>https://www.gov.uk/government/news/rigorous-new-targets-for-green-building-revolution#:~:text=Responding%20to%20a%20consultation%20on,zero%20carbon%20ready%20by%202025.</p>
Wheelchair housing – great idea – if only 10 dwelling gets built does the developer need to provide one or 5% half a dwelling and not provide any.	The expectation is that on a site of 10 units the requirement will be rounded up i.e. 5% would equal the need for 1 wheelchair user dwelling. This will be clarified in the policy supporting text.
How many empty homes are there in the district and have these been taken into account in the housing	All local markets both have and need a level of short term empty homes in order to function properly however tackling and reducing long term vacant homes is a key issue. Reduction in long term vacant homes can be taken into account when planning for and assessing the need for new housing as long there is clear evidence to indicate that the

<p>needs figures. When will the empty homes action plan be available.</p>	<p>assumed reduction will be achieved. Reduction in long term vacant homes however is only likely to make a small contribution in comparison to the scale of new housing required. Moreover, the Council also has to take account of projected losses in the existing housing stock i.e. though demolitions and clearance.</p> <p>The latest government published data on empty homes is available at the following website. https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants</p> <p>This show that as of October 2019 there were 4,040 long term vacant homes in the district and 8,737 empty homes in total.</p> <p>The Council's Empty Homes Strategy is available on its website at the following address: https://www.bradford.gov.uk/housing/policies-and-reports/housing-and-related-strategies/</p>
<p>How can developers be encouraged to be creative – we don't need more detached executive homes but more affordable housing for larger families. Eco-type village developments would be more appealing.</p>	<p>The Council has included policies within the Local Plan, to ensure that sites deliver a mix of house types (Policy HO4), the provision of affordable housing (Policy HO5), specialist housing such as for older people and for custom and self-build (Policies HO7 and HO6), for travellers and show people (Policy HO8).</p> <p>Policy HO9 sets out criteria to ensure certain minimum housing standards are met, and the Council has produced a Homes and Neighbourhood Housing Design Guide Supplementary Planning Document (SPD).</p> <p>All of these policy tools are aimed at driving up standards and achieving an appropriate mix in terms of type, size and tenure of housing to meet identified needs and will be used when determining planning applications.</p>
<p>Is there any stipulation to include bio-diversity within new housing development, by retaining existing mature trees and introducing bio-diverse new housing and shared space gardens.</p>	<p>Yes. All development (except householder applications) should deliver a measurable net gain in biodiversity value compared with the pre-development baseline. Policy EN2: Biodiversity and Geodiversity sets out development should attain biodiversity net gain, in the first instance onsite, through habitat retention, enhancement and creation. Policy HO9 sets out criteria to ensure certain minimum housing standards are met, and the Council has produced a Homes and Neighbourhood Housing Design Guide Supplementary Planning Document (SPD) which includes the need for natural green space within developments.</p> <p>In Section 5 of the plan on site allocation pro formas where there are areas of trees or woodland that need to be protected/enhanced or increased tree cover this is set out in the constraints/opportunities and development considerations.</p>

	<p>All of these policy tools are aimed at ensuring housing development delivers a net gain in biodiversity and will be used when determining planning applications.</p>
<p>How will design quality be ensured, and what methods are there that the council is promoting to ensure it is enforced and achievable. Quality is different to different stakeholders. Will a design panel of public and private sector and community individuals be formed to advise.</p>	<p>Policy HO9 Housing Standards sets out criteria to ensure certain minimum housing standards are met, and Criterion A links to the council's design policies DS1 to DS5 together with the Homes and Neighbourhoods Housing Design Guide SPD which provides guidance on the process for achieving good design and how the quality of residential development proposals will be assessed</p> <p>The council will seek to explore further the role of design panels in ensuring good design and the particular make-up of design panels.</p>
<p>What exceptional circumstances are considering removing B14/H and B18/H from Green Belt?</p>	<p>The council has indicated its approach to green belt and why it considers that there are exceptional circumstances exist to consider release of Green belt land to meet identified housing need within strategic policy SP5: Green Belt. This is in accordance with NPPF paragraph 137, which requires that before concluding that exceptional circumstances exist, the local planning authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.</p>
<p>Are posted comments still not possible due to the staffing situation in the Planning office?</p>	<p>The council will accept post written representations to the Regulation 18 Draft Local Plan.</p>
<p>If we can identify other possible sites for development which are presently not in the development plan and not in green belt, how will that directly affect B14/H and B18/H?</p>	<p>Possibly but not necessarily as this depend on the site options and targets not only in that settlement but in others. The Council is required to put forward proposals which reflect the reasonable alternative options and over time those options can change as new sites emerge or existing options are discounted.</p> <p>The Council has issued a call for sites and is in particular encouraging the submission of sites within settlements and on previously developed land. Any submissions will be included within the Strategic Land Assessment to assess their suitability, availability and deliverability for housing or other uses. The SLA provides an overall picture of land supply and is one of several areas of evidence which will be updated and taken into account, along with representations made during the current consultation, when the Council finalises the Local Plan.</p> <p>The housing targets for settlements and the preferred site options for meeting those targets will be thus be reassessed in the light of new and updated evidence when preparing the Draft Local Plan (Regulation 19).</p>

