

Q and A Responses - Session 11: Regional City – 8th March 2021

Session Questions / Matters Raised	Response
Further explanation of the housing distribution numbers presented.	<p>The Plan sets out within Policy SP8 how the overall district wide housing growth of over 26,000 new homes will be distributed. The table on the presentation slide shows that 72.5% of the overall housing requirement (20,075 dwellings) will be focused on the Regional City of Bradford.</p> <p>This reflects where the need for housing is greatest due to projected population and household growth. It also reflects the scale and distribution of land supply options (the Strategic Land Assessment is the background document which has gathered together all site options across the district and carried out a basic assessment of the availability and deliverability – this is available online on the evidence base section within the Local Plan web pages)</p> <p>The table also indicates the number of homes to be provided within each of the 7 sub areas which make up the Regional City.</p>
How has the need for industrial and commercial development been assessed?	<p>A range of evidence has been taken into account in assessing the need for employment and commercial development / land. In 2019 an Employment Needs Assessment was undertaken which provided a picture at that time of the projected growth and change within the economy and approximate scale of land which would need to be allocated for employment uses to support that growth. However due to developments since 2019 - in particular the ongoing uncertainties in anticipating trends in the short to medium term resulting from both the impacts of the Coronavirus pandemic and to Brexit– and also the need to look at demographic and housing growth in the round further work has been commissioned and published on the web pages. This includes a Future Employment Analysis Paper and a paper by Edge Analytics which examined updated demographic evidence and trends.</p> <p>The policies within the plan reflect this evidence and seek to support the delivery of around 1,600 jobs per annum (Policy SP6), set out key sectors for growth and indicates the need to allocate 72ha of employment land. Key site allocations are set out in Policy EC1. Employment zones, enterprise zone and Business Development Zones are also</p>
Have sites been considered for all uses.	Yes.

<p>The Esholt site covers 26ha – how many homes could this accommodate if it were allocated for housing rather than employment uses?</p>	<p>The yield for housing sites in the plan is the result of a number of considerations. Firstly, an assessment of the net site area is made. The net site area reflects the remaining site area after an allowance is made for the provision of infrastructure, landscaping, services, communal open spaces and other non-residential uses. For sites above 10ha but below 100ha an assumption is made that the net site area will be around 65% of the gross figure. If a site has a valid extant planning permission the yield within permissions may be taken, if not an assumption has to be made of the likely density achieved based on the site's location and the likely mix of housing. The Local Plan has a policy assuming a minimum density of 35 dwellings per hectare however this figure is higher in locations on high frequency public transport corridors and within and close to town and city centres. Site characteristics and constraints may also the initial assessed yield.</p> <p>With regards to the Esholt site - based on the above guidelines a 26ha site would be assumed to have a net area of 16.9ha which if delivering the minimum 35dps density would result in 592 dwellings.</p>
<p>There're challenges in securing quality development through conversion of mills located in inner city areas. Risk of creating 'modern day/future slum' with potential issues related to higher density, lack of essential facilities, poor quality of construction etc.</p>	<p>As identified within the presentation, the Council has identified a number of mills within the Regional City for housing development. They provide a huge opportunity for high quality development which conserves these heritage assets and encourages regeneration but they are often complex schemes which require careful design.</p> <p>There has been mixed results with regards to the quality of conversions of mills and industrial properties, in particular the quality of accommodation on offer. However, there have been significant successes such as at Lister Mills.</p> <p>The Local Plan's team are working with colleagues in the Conservation team to assess the heritage impacts of potential sites and develop site allocation policies which ensure that sites are developed sympathetically.</p> <p>The Local Plan also has a range of policies aimed at securing good quality design – for example 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>How has habitats and landscape value of sites been considered.</p>	<p>All sites have been screened and assessed to see if they lie within areas subject to national or local landscape or ecological / habitat designations and protection. Advice and input has been secured from the Council's landscape and ecology teams. In certain areas survey work will be carried out this Spring to ascertain the wildlife and habitat value of sites.</p> <p>Prominence and visual impact of sites has been taken into account in site assessments. For sites identified as preferred options i.e. housing allocations further details of the site qualities and constraints are in each case set out on the site proformas which lie within section 5 of the plan.</p> <p>The site assessment and rejected sites background paper which is available on the Local plan web pages not only lists sites which have been rejected but the reasons for rejection and it can be seen that impacts on landscape and ecology are reasons which have seen some sites ruled out.</p>
<p>Why account has been taken of the contribution which small brownfield sites can make and of the work being done by WYCA to bring forward brownfield sites?</p>	<p>The Local Plan's proposals for sites for both housing and employment reflect a full and exhaustive assessment of all brownfield site options. All sites whether previously developed or greenfield have to be assessed against a range of criteria and shown to be available and capable of being delivered in the short term or developed in the medium or longer term. There are a large range of derelict and previously developed sites identified within the Regional City for housing and employment development. The Council are working with WYCA to deliver brownfield sites and utilise government funding streams and such activity will be needed if all of the brownfield sites identified in the Plan are to be fully implemented</p> <p>The site size threshold for inclusion of sites within the plan has been reduced to just 0.2ha (or 5 units) compared to 0.4ha in the last plan produced (the Replacement Unitary Development plan). The council have also included an allowance for windfall development.</p> <p>The plan therefore takes full account of the potential for both small and larger brownfield sites.</p>
<p>How are empty homes considered?</p>	<p>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 assumed reduction will be achieved. Reduction in long term vacant homes however is only likely to make a small contribution in</p>

	<p>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. through 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 shows 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>
Council should consider CPO for empty homes and bring them back to use.	<p>The CPO process is a long, complex, sometimes expensive process which is more geared towards the delivery of larger schemes, complex regeneration sites and new infrastructure delivery. It is not suited for use for individual empty homes.</p> <p>However, the Council's Empty Homes Strategy identifies a range of measures which the Council proactively takes to enable empty homes to be brought back into use.</p>
What about windfall and the contribution which could be made from office conversions?	<p>NPPF paragraph 70 indicates that it is reasonable to make an allowance for windfall sites as part of the anticipated future supply, as long as there is compelling evidence to do so and that any allowance is realistic. Based on historic windfall delivery rates and future trends the Council considers that it is reasonable to make a modest assumed contribution of 300 units per annum for years 3-18 for the plan-period. This is factored into the housing requirement in strategic Policy SP8: housing growth.</p>
General comments- Allocation of land for housing on sites peripheral to Leeds boundary should be avoided as much as possible, as these will result in creating more houses in already affluent areas. Allocations towards inner/ central locations will help achieve equality in provisions.	<p>The comments are noted. The Local Plan does indeed propose that a large proportion of development is located in central locations within the main urban areas – for example 7,000 homes within Bradford City Centre. This is considered sustainable not least because of the potential regeneration benefits that such sites will offer.</p> <p>Wherever possible the Council have tried to avoid development in peripheral locations and where edge of settlement sites are proposed the full impacts on those proposals including any</p>

	<p>cross boundary impacts have been considered. The Council does however consider that there are some instances such as at Holme Wood where it is possible to bring forward sustainable urban extensions.</p> <p>The most affluent areas of the district lie within Wharfedale. The plan only proposes limited development here – only 1,450 homes or 5% of the district wide total. However even here much more modest housing development has a role in supporting these centres, increasing housing choice and providing affordable housing.</p>
Is there any legal requirement for the developers to contribute towards clearing brownfield sites to make them viable?	<p>Owners and developers of brownfield sites will need to include proposals, where relevant, for the remediation and clearance of their sites as part of their housing schemes.</p> <p>However, depending on what is meant by the question – the owners and proponents of green field sites are under no obligation to provide funds for the clearance of other sites they do not own / or are not developing themselves.</p> <p>From time to time funding streams do become available from Government for the clearance and facilitation of brownfield development. The Council are currently working with the West Yorkshire Combined Authority (WYCA) to secure access to part of the Brownfield Sites fund. The Council has also worked successfully in partnership with private developers in the past to bring forward brownfield sites or to develop affordable housing on brownfield sites in Partnership with social housing providers.</p>