



THE HOME BUILDERS FEDERATION

Date: 16th February 2015
Consultee ID: 105
Matter: 4C

BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION

MATTER 4C: HOUSING REQUIREMENTS

Is the approach to the distribution of housing development to the various towns and settlements in Bradford fully justified with evidence, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

Question 4.3: Policy HO3 – Distribution of Housing Development

a. Is there sufficient evidence available to justify the proposed distribution of housing development to the various towns and settlements in Bradford; and is the proposed distribution supported by the evidence?

1. The plan places significant reliance upon the regional city of Bradford supporting the majority of growth with some 28,650 dwellings anticipated to come from this area. The 2013 SHLAA (ref: EB049) identifies a potential capacity in excess of 30,000 dwellings for this area, however, 3,286 units are identified as being 'residual supply' which will not be delivered during the plan period and as such the actual potential delivery is only 27,051. Similarly amongst the sub-areas the city centre and Bradford SE areas cannot accommodate the growth identified.
2. In addition to the shortfalls noted within the SHLAA the HBF considers that the proposed approach does not pay full regard to the viability of development within these areas. The Council's *Local Plan Core Strategy – Viability Assessment* and subsequent update (EB045 and EB046 respectively) both clearly identify the viability challenges of delivery within the city centre under current market conditions (see tables 4.4, 4.9, 4.12, 4.14, 4.17 & 4.22 of EB045). Whilst it is noted that market conditions may improve over time the scale of the development proposed for this areas is such that development needs to deliver early in the plan period, it cannot wait 5, 10 or 15 years for such conditions to potentially materialise. Failure to deliver early in the plan period will jeopardise the Council's ability to meet its housing requirement and achieve a 5 year supply of housing.
3. Whilst, in principle, the HBF does not dispute that the regional city should be the focus for development the delivery of the plan requirements are also of paramount importance. In this regard it is recommended that the Council seek to reduce its reliance upon the regional city of Bradford by

redistributing some of the identified growth to other more viable and deliverable locations.

b. Does the policy pay sufficient regard to viability considerations?

4. See our response to question 4.3a above.

c. to e.

5. The HBF has no further comments at this stage.

Matthew Good

Planning Manager – Local Plans

Email: matthew.good@hbf.co.uk

Tel: 07972774229