



THE HOME BUILDERS FEDERATION

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

BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION

MATTER 4E: HOUSING PROVISION

Is the Council's approach to establishing housing site allocation principles consistent with national guidance (NPPF/PPG)?

Question 4.4 HO7 – Housing Site Allocation Principles:

a. Is the approach to establishing housing site allocations, including the various criteria, supported by evidence, and is it effective, clear and soundly-based?

1. No, the HBF considers that the policy inappropriately places priority upon brownfield land. This is considered contrary to the NPPF and is likely to impact upon the overall deliverability of the plan.
2. Part E of the policy refers to minimising the use of Green Belt. The plan and supporting evidence both recognise the need to release Green Belt. Utilising the Council's own assessment of objectively assessed housing needs, which the HBF disagrees with, approximately 11,000 homes will need to be accommodated in the Green Belt. In this regard to be clear and effective the Policy should recognise the need to release Green Belt to meet its needs for housing and employment.

b. Does the policy properly consider the balance between homes and jobs, and between prioritising brownfield against greenfield land?

3. Part C of the policy seeks to maximise the use of previously developed land within the Plan area and prioritise their development via phasing policies. The HBF has not seen any justification for such a phasing approach. As discussed in greater detail in our response to the questions 7.5 and 7.7 (Matter 7b) the HBF considers such an approach to be contrary to the NPPF.

c. & d.

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

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