

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)  
(Representor ID: 423)*****Matter 4A: HOUSING REQUIREMENT*****Preamble**

1. On behalf of our client Persimmon Homes (West Yorkshire), we write to provide comments in response to the Inspector's schedule of Matters, Issues and Questions in relation to the Bradford Local Plan Core Strategy. This follows our previous comments made on the Publication Draft of the Core Strategy in March 2014.
2. Our client is one of the UK's leading house builders, committed to the highest standards of design, construction and service. They have a large number of site interests across Bradford District and therefore are very keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

**Persimmon Homes Site Interests in Bradford**

3. This is a list of our areas where our client has site interests:

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley
- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

- Nab Wood (Shipley)
- Heaton (North West Bradford)
- Daisy Hill (North West Bradford)

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 4A, which covers Housing Requirement, is contained in this statement. The key issue highlighted by the Inspector is:

**“Has the Council undertaken its objective assessment of housing need in line with the latest national guidance and good practice (NPPF/NPPG)?”**

6. We consider below the specific questions asked by the Inspector:

***Policy HO1 – The District’s Housing Requirement***

**a) How has the Council undertaken an objective assessment of housing needs for Bradford, which is justified by robust and proportionate evidence and has been positively prepared, taking account of all the relevant factors, and does the Plan fully meet the objectively assessed needs for market and affordable housing in Bradford, along with any unmet housing requirements from neighbouring authorities including:**

- i. **The Plan proposes to provide at least 42,100 homes (2013 – 2030). What is the basis, justification, assumptions and methodology for the proposed level of housing provision, having regard to the supporting evidence (including the SHMA & SHLAA, Housing Requirement Study (August 2013 update), Housing Background Paper), recent population/household projections (including the 2008/2011-based household projections and the 2012 sub-national population projections), demographic drivers, housing demand and market signals, the need for affordable housing and the relationship with the economic strategy, in line with the guidance in the NPPF and Planning Practice Guidance)?**

7. The Council has set a housing requirement of 42,100 homes over the plan period (up to 2030). This equates to 2,200 dwellings per annum plus addressing a backlog of 7,687 dwellings that has occurred since 2004. It also takes into account the re-occupation of 3,000 empty homes.
8. In arriving at this requirement the Council has undertaken a number of studies using varying assumptions which have provided a number of scenarios. However the current strategy chosen does not appear to be linked to any specific demographic projections, the Strategic Housing Market Assessment ("SHMA") (EB/050-053), or modelled housing scenarios (as required in ID-2a-016-20140306 of the NPPG). Instead it appears that the housing requirement has been based on a midway point (2,186 dwellings per annum) between two modelled economic scenarios of the 2008-based and the interim 2011-based sub national household projections which give a range of 2,565 dwellings per annum (2008) and 1,807 dwellings per annum (2011). The Council's *Housing Requirement Study Update* (EB/033) produced by Edge Analytics (September 2014) utilises the more recent 2012 sub national population projections to provide slightly lower figures of 2,307 dwellings per annum (2008), 1,791 dwellings per annum (2011) and a mid-point of 2,049 dwellings per annum. In spite of this additional work the Council have maintained the requirement of 2,200 dwellings per annum. There appears to be no direct justification for the housing requirement advocated by the Council and so our client contends that this cannot represent the Council's objectively assessed need ("OAN").
9. This position is further exacerbated by the use of 'trend' headship rates derived from the interim 2011-based household projections when considering housing growth scenarios post-2021. This arguably results in a lower level of household growth than might be realistically expected as these figures reflect recessionary trends. This approach is fundamentally flawed, is unjustified and will lead to an ineffective policy.
10. The NPPG emphasises the need to match up housing requirements with local economic strategies (ID-2a-018-20140306). To this degree our client supports that the Council is taking into account economic scenarios when considering housing requirements, however as a result of the flaws highlighted above there is a degree of disconnect between the Council's economic strategy and its housing target. Policy EC2 of the Core Strategy identifies that the Council is aiming for the creation of at least 2,897 jobs annually. As outlined in our previous representations however the current housing target would support only around 1,600 jobs per annum. This would indicate that housing numbers proposed would be insufficient to meet the Council's current economic aspirations and would mean Policy SC3 (which seeks to balance housing with current and future employment opportunities) cannot be achieved.

11. The result of this mismatch between economic aspirations and housing growth will either result in an oversupply of employment land (with resultant loss in the district's economic potential) or a large amount of in-commuting which would be unsustainable and would conflict with the overall approach in the NPPF.
12. With the publication of the NPPG in March 2014, local planning authorities are now required to also take into account relevant market signals when establishing their OAN (ID-2a-019-20140306). Whilst it is noted that market signals were referenced in the Council's *Housing Requirements Study* (February 2013) (EB/028) there is no discussion regarding how this affects the proposed housing requirement. As such it is considered that this is a failing of the current needs assessment.
13. As a result of these points, our client considers the Council's method for calculating housing requirements is flawed.

**ii. What is the current and future 5,10 & 15 year housing land supply position including existing commitments, future proposed provision, allowance for windfalls, phasing, balance between brownfield and Greenfield sites, and provision identified in the latest SHLAA; and how will the proposed housing provision be effectively delivered?**

14. The *Strategic Housing Land Availability Assessment* ("SHLAA") (May 2013) (EB/049) identifies that the Council does not have a 5 year supply of deliverable sites and instead can only demonstrate, at best, a housing land supply of around 2.3 years with a notable shortfall in dwellings which has accumulated over recent years. Whilst our client notes that this assessment does not reflect the current position (given the SHLAA dates from 2013), it believes it is unlikely (given the shortfall recorded) that the Council will be able to demonstrate a five year housing land supply in the immediate future.
15. The SHLAA does identify sufficient land to meet the overall requirement currently expressed in the Core Strategy by providing land for 53,708 dwellings, although as noted in our previous representations, there are number of deficiencies in specific areas of Bradford and its district where the Council's targets do not meet the supply found in the SHLAA (for instance in South East Bradford and Bradford City Centre). However despite the SHLAA overall identifying sufficient land, as a result of other policies in the Core Strategy relating to phasing (Policy HO4) and the prioritisation of brownfield sites (Policy HO6), then there is still an insufficient supply to meet the requirement in the first five years (even when the backlog is not included).

The effect of these policies is essentially to hold back housing development which directly conflicts with the NPPF's requirement to 'boost significantly' the supply of housing and maintain a 5 year supply of deliverable housing sites (paragraph 47).

16. This again highlights that Policies HO4 and HO6 need to be removed or substantially modified so as to allow viable and sustainable housing development to come forward much sooner and to allow the Council to address its housing requirements and to be able to show a 5 year supply of deliverable housing sites. Failure to do this will simply mean that upon adoption, the relevant housing policies in the Core Strategy will be regarded as out of date.

**iii. How does the Plan address the need for a 5%/20% buffer to 5 year housing land supply, as required by the NPPF ( paragraph 47) to significantly boost housing supply, and how does it address previous shortfalls in housing provision, both during and before the current Plan period?**

17. From the data provided by the Council through its latest Annual Monitoring Report ("AMR") published in March 2014, the Council has persistently failed to deliver the required amount of houses from 2004 – 2013; in fact it has only met its target in two years over this period and has accumulated a backlog of 7,687 dwellings. This backlog however measures delivery against the housing figures contained in the Regional Strategy from 2004 until 2011. It is firmly established that the housing figures in the Regional Strategy were constrained and did not represent the Council's OAN (which would be higher). It can therefore be maintained that the shortfall should be even greater than this.
18. Irrespective of this however, this persistent under delivery would indicate a 20% buffer would need to be applied and this position is consistent with recent case law; most notably *Cotswold DC v. Secretary of State for Communities and Local Government, Fay & Son Ltd [2013] EWHC 3719 (Admin)*.
19. The phasing policy contained within Policy HO4 would indicate that the strategy is to spread previously accumulated the backlog over the plan period, with delivery of dwellings to be 'stepped up' towards the final 7 years of the plan period. This approach however conflicts with

the advice contained in the NPPG which states:

**“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’” (ID 3-035-20140306).**

20. As it is clear that the Council does not have agreements in place for neighbouring authorities to address any unmet need (please see our comments below), then our client believes the shortfall should be addressed in the first five years. This will ensure that the Council’s approach will ‘significantly boost’ housing supply as required by paragraph 47 of the NPPF.

**iv. How does the Plan address previous backlogs in housing provision?**

21. Please see our above comments in paragraphs 17 – 20. The plan currently seeks to spread the backlog over the plan period. This is inconsistent with the advice contained within the NPPG and in the absence of a neighbouring authority accommodating some of this backlog, then the Council should aim to address any shortfalls within the first five years.

**v. Is the allowance for vacant dwellings fully justified with evidence?**

22. The Core Strategy seeks to bring 3,000 empty homes back into use as part of its overall approach to delivering housing over the plan period. These are therefore discounted from the overall housing requirement. The NPPG makes an allowance for local planning authorities to include empty homes within its supply. In advising local planning authorities the NPPG states:

**“Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by the local planning authority at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting (local planning authorities would need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local plans).” (ID-3-039-20140306)**

23. It is clear from this advice that the intention from the NPPG is to allow vacant units to make up part of the proposed housing supply within a local authority area, rather than forming part of the housing requirement. Our client therefore maintains that whilst bringing empty homes back into use is a sensible aim, the Council cannot ‘net off’ these properties from its housing targets.

24. Irrespective of this, the key consideration here is the strength of the evidence and whilst it is noted that the Council have published a number of strategies which seek to provide a means for vacant stock to become homes again, it is unclear as to whether all this stock can viably come forward. Given the amount of empty dwellings accounted for in the Core Strategy is large, if a proportion of these are not viable to bring back into use, then this will have a significant effect on the Council being able to meet its housing targets.
25. Likewise it needs to be clarified as to the status of the empty dwellings and whether they are classed as part of the current housing stock or whether they have been removed (if so, when). This will ensure any double counting is avoided.

**vi. How will the Plan fully meet the need for affordable housing (c. 587 units/year)?**

26. Our response to this is contained within our statement relating to Matter 4F and for ease of reference this is replicated below.
27. The net annual shortfall calculated within the 2013 SHMA (EB/052) assumes that the backlog need is to be addressed over a 10 year period and this provides the annual net shortfall of 587 affordable homes. However a 5 year period to address the backlog need is more widely and commonly used by local planning authorities. On this basis the net annual shortfall would be greater at 1,302 dwellings annually.
28. Notwithstanding this, even on the basis of addressing the backlog over a 10 year period, 587 dwellings annually would require an affordable housing percentage of over 25% on developments coming forward to address this shortfall (based on 2,200 dwellings per annum). This would be over and above the requirements set out in Policy HO11 as the majority of the Council's housing would be delivered in areas where the affordable housing requirement would be between 15% and 20%. Consequently the Council would not be able to deliver enough affordable housing to meet the identified need and it is unclear from the Core Strategy and its evidence base how the Council intend to address the identified need.
29. Where it is the case that local planning authorities are struggling to meet their affordable housing needs, the NPPG recommends that increasing the total housing figures to be included in the local plan should be considered as this can help deliver a greater number of

affordable homes. It states:

**“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.” (ID-2a-029-20140306).**

**b) Has the overall housing provision level been set too high or too low?**

30. Whilst the Council’s methodology for calculating its housing requirements is flawed, we believe that taking into account the necessary inputs, that a housing figure of 2,670 dwellings per annum (or 45,390 dwellings over the period 2013 – 2030) is justified, before any deduction is made for empty properties being brought back into use. This figure is only just above the 2,652 dwellings per annum target set out by the Council in the Core Strategy (before vacant homes are ‘netted off’).
31. Our client however suggests that this should represent a minimum figure and that when taking into account Policy EC2 and the economic aspirations of the Council to provide 2,897 new jobs annually, then a higher figure of anywhere up to 3,300 dwellings per annum is required.

**c) What alternative levels of housing provision have been considered, having regard to any significant and demonstrable adverse impacts of proposing increased levels of housing provision within Bradford; what would be the basis and justification for any alternative level of housing provision?**

32. We are unaware of alternative levels of housing provision being proposed by the Council outside of the scenario testing within the *Housing Requirement Study* (and its update (EB/028-033)), however we understand that additional modelling work has been undertaken by participants at this Examination which calculates a housing requirement of 2,670 dwellings per annum or 45,390 dwellings over the period 2013 - 2030 (before any deduction is made for empty properties being brought back into use). We support this figure and believe it to be justified and appropriately evidenced. As outlined above however we believe this figure should be treated as a minimum and note that if the strategy for achieving the target of 2,897 new jobs annually is to be met (through Policy EC2), then a higher figure of anywhere up to 3,300 dwellings per annum is required.



**d) How does the objective assessment of housing needs relate to the employment and jobs strategy?**

33. As outlined in our comments above, currently we do not believe that the level of housing proposed within the Core Strategy properly aligns with the economic aspirations for Bradford and its district over the plan period. The housing requirement stated in the Core Strategy (2,200 dwellings per annum) would support on around 1,600 new jobs per annum rather than the 2,897 jobs per annum which is outlined in Policy EC2.
34. On this basis it is clear that the housing requirement would need to be increased in order to satisfy Policy EC2 in a sustainable manner and without significantly increasing levels of in-commuting

**e) Does Policy HO1 effectively address cross-boundary housing issues, including the relationship with Leeds City Region, in line with the NPPF (paragraphs 178-181), and has it taken into account the housing and economic strategies, plans, priorities and projects of adjoining authorities and other bodies/agencies?**

35. Our previous representations to the Publication Draft of the Core Strategy highlighted our concerns regarding the lack of cooperation between the Council and neighbouring authorities to properly consider impacts 'beyond the plan area'. We note that additional work has been undertaken since this time, nevertheless our client still has concerns that cross-boundary housing issues have not been fully considered by the Council.
36. The NPPG is very clear in its advice that the duty to cooperate has to be more than just meetings and consultation between local planning authorities, but rather there needs to show a process with outcomes (ID-9-003-20140306).
37. The Council have produced the background paper *Duty to Cooperate Statement* (December 2014) (SD/006). Whilst this highlights meeting and discussions that have taken place between the Council and neighbouring authorities and includes a section on cross-boundary housing issues, it somewhat stops short of explaining fully the outcomes of these discussions and how these have influenced the approach to housing within the Core Strategy. For example it is unclear as to the input other authorities have had on the Council's overall housing figure or whether the Council has at any time suggested that a neighbouring authority could assist in meeting its objectively assessed housing needs (or indeed if a neighbouring authority has approach the Council to assist in meeting their housing needs).

38. The background paper goes on to suggest that Bradford is a largely self-contained housing market area but nevertheless there are a number of notable cross-boundary relationships with neighbouring authorities. What is not clear however are the details about which issues were discussed with neighbouring authorities and what outcomes and actions were agreed. This leaves many unanswered questions regarding how the Council has dealt with cross-boundary housing issues and how its approach in the Core Strategy ties in with the wider strategy for the Leeds City Region.