

MATTER 7B: Managing Housing Delivery

**MATTER 7B: MANAGING HOUSING DELIVERY**  
**Policy HO4 – Phasing and Release of Housing Sites**  
**Policy HO5 – Housing Density**  
**Policy HO6 – Previously Developed Land**  
**Policy HO8 – Housing Mix**  
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**Policy HO10 – Overcrowding and Empty Homes**

**7.5 Policy HO4 – Phasing & Release of Housing Sites**

- a. What is the justification for the Council’s proposed approach to phasing and releasing housing sites?
- b. Is the approach to phasing in line with national guidance (NPPF; ¶ 47)?
- c. Would the phasing approach lead to shortfalls in housing provision, putting at risk 5-year housing land supply?
- d. Does the proposed approach to phasing properly recognise infrastructure requirements (including cross-boundary infrastructure requirements)?

**7.6 Policy HO5 – Housing Density**

- e. Is the approach to housing density in accordance with national policy?
- f. Would the proposed approach adversely affect 5-year housing supply?
- g. Should the policy introduce more flexibility to address viability and other considerations?
- h. Is there sufficient evidence to justify the specific density targets for particular areas?

**7.7 Policy HO6 – Previously Developed Land**

- i. Is the Council’s approach to prioritising development on Previously Developed Land consistent with the latest national guidance in the NPPF/PPG?
- j. Will the proposed targets stifle development and undermine meeting housing need and supply?
- k. Are the proposed targets fully justified with available evidence?
- l. Do the proposed targets properly reflect viability considerations, or should the policy provide more flexibility to ensure that it is effective?

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**7.5 - Policy HO4 – PHASING THE RELEASE OF HOUSING SITES**

The below comments made in relation to Policy HO4 remain valid. We maintain our view that this policy is not sound. It is not justified and does not align with national policy. The housing delivery parameters set out in the Core Strategy Appendix 6 (Table 3) do not provide any further reassurance that this policy will appropriately manage the release of housing sites. For example the two proposed phases are 7 and 8 years long, and there is a trigger for perhaps releasing sites in the latter phase should completions fall below acceptable levels (which is 35%) for more than 3 years in phase 1. The wording is “Sites which would otherwise be held

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back under the Council's phasing policy may be brought forward for release." (underlining our emphasis).

This type of managed (phased) release policies were used in the production of the reviews of the West Yorkshire authorities UDP's and they proved to be a prime contributor to under-delivery against annual housing requirement targets. Given the scale of the District's housing requirement, its housing market problems and the increasing gap between need and supply the phasing and implied trigger mechanism approach is wholly counter-productive and against national policy. On this basis policy HO4 is unsound. Division into two rigidly timed phases is a very negative step. The fact that no indicators are provided in the table at the end of the policy adds to the conclusion that this proposed approach is poorly thought through, unjustified and would be very difficult to monitor.

Some sites will have long gestation and delivery periods which necessitates their early release to ensure full delivery outcomes within the plan period. Such an approach is likely to inhibit the ongoing achievement of a five year supply.

#### **7.6 - POLICY HO5 DENSITY OF HOUSING SCHEMES**

The 30dph minimum is, as we have previously stated, not always deliverable and whilst the wording of the policy is not too prescriptive i.e. "densities should normally achieve at least a minimum of 30 dwellings per hectare..." the 90% target of units achieving a minimum density of 30 dph is in our opinion unachievable.

The NPPF at paragraph 59 considers that "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development..." The emphasis in the framework is on policies 'guiding' density.

On a number of sites in Bradford it has not proved possible due to access, topography and their constraints to achieve the minimum net density target of 30 dwgs/hectare also contained in the current development plan. This target, if it is to remain as a statement of policy requires more clarification and qualification.

#### **7.7 - POLICY HO6- MAXIMISING THE USE OF PREVIOUSLY DEVELOPED LAND**

The granting of priority to brownfield sites is contrary to the NPPF as this states that brownfield development should be encouraged. This clearly implies that brownfield development should proceed in tandem with greenfield development. Historically high brownfield land development rates have been achieved in Bradford under national and local policy guidance which did then

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prioritise such development under the much earlier planning policy guidance contained in PPG3. The use of an indicative and aspirational target for brownfield development of around 50% is supported and performance against this target can be monitored as the plan period progresses. The target should be used as a guideline and not a punitive policy instrument. The policy as worded is unsound as it is contrary to national policy.

There is too much emphasis in Policy HO6 on prioritising the development of previously developed land rather than ‘encouraging’ it, which is the approach taken in the Framework. One of the Core planning principles in the Framework (paragraph 17) is to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.”