



Bradford Local Plan Core Strategy Examination - Hearing Statement

Representations on behalf of CEG Land Promotions Ltd (CEG)

Representor Reference: 495
Date: February 2015

Matter 4B: Housing Supply

Key issue:

Is the approach to identifying the strategic sources of housing supply fully justified with up-to-date and reliable evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?

Question 4.2: Policy HO2 – Strategic Sources of Housing Supply

a) Is there sufficient evidence to justify the main strategic sources of housing supply, including completions and commitments, former RUDP sites, including safeguarded land, new deliverable/developable sites, area-based initiatives including Growth Areas, including Urban Eco-Settlement in Shipley/Canal Road Corridor, Bradford City Centre, SE Bradford, Queensbury, Thornton, Silsden and Steeton with Eastburn, Holme Wood Urban Extension, and local Green Belt releases;

- 1.1 The evidence provided by the Council does not include proper or sound justification to allow a conclusion to be reached that the identified 'Strategic Sources of Housing Supply' will deliver the number of homes required to meet the full objectively assessed needs of the District. To the contrary, the evidence demonstrates the opposite.
- 1.2 Paragraph 5.3.37 of the Core Strategy which precedes Policy HO2 sets out a summary of the anticipated supply from these sources.
- 1.3 Paragraph 5.3.37 firstly identifies 19,500 dwellings categorised within the 2013 SHLAA as being 'suitable now'. Much of this supply takes the form of existing permissions and allocated sites carried over from the RUDP. Whilst it is appropriate to have regard to this as part of the evidence relating to an important source of supply, there is still a need to consider whether this part of potential supply is genuinely deliverable and developable within the plan period (as required under the approach set out in footnote 12 of paragraph 47 of the Framework). This is all the more so in respect of historic existing permissions and allocated sites which have not come forward as anticipated; this is often good evidence of problems with the deliverability. In the absence of any progress with the Site Allocations DPD (and very limited progress with the City

Centre and the Shipley and Canal Road Corridor Area Action Plans) and the resultant testing of such sites in this way, there is an insufficient justification provided by the Council to demonstrate that this level of supply is genuinely deliverable and developable.

- 1.4 In the absence of such testing, there is no basis for concluding that this first strategic source will deliver the 19,500 dwellings that the Council anticipates.
- 1.5 Paragraph 5.3.37 also refers (and this is then reflected in the distribution approach set out in Policy HO3) to ‘around’ 3,200 dwellings being delivered in the Canal Road AAP area, 3,500 dwellings from within the Bradford City Centre AAP area and 6,000 houses in Bradford South East, within which an urban extension is proposed at Holme Wood.
- 1.6 The information contained in the 2013 SHLAA does not justify relying on the proposed delivery from such claimed ‘Strategic Sources’ during the plan period. An analysis of the SHLAA undertaken for CEG is set out at **Appendix 1** of this statement. It compares the Council’s forecast yield over the trajectory period of the SHLAA (to 2029) against proposed distribution on a sub-area and settlement basis. This analysis has also not made any adjustments to the Council’s identified yield on the basis of a site-by-site assessment to include lead in times, densities, or delivery rates. Whilst it is CEG’s position that not all sites in the SHLAA are deliverable, the CEG review has also not sought to discount any individual sites; as such it presents very much a ‘best case’ scenario of yield for the Council. CEG’s analysis goes on to apply the correct approach to assessment. The basic difference with the approach of the Council (as contained in the settlement tables contained at pages 40-66 of Council’s Background Papers 2: Housing (Part 1)) is that the Council has inexplicably and unsoundly sought to include those dwellings which the SHLAA itself identifies would be delivered after the identified trajectory period (to 2029) (referred to in the SHLAA as ‘Residual Capacity’). This is therefore incapable of representing a source of supply for the plan period itself.
- 1.7 In the case of the City Centre, the 2013 SHLAA indicates that a total of just 2,752 dwellings are capable of being delivered on all identified sites within this area during the plan period. This represents a shortfall of 748 dwellings over the assumption made by the Council. Similar deficiencies are also identified for both the Canal Road area (just 1,994 dwellings representing a shortfall of 1,206 against the required and assumed supply) and Bradford South East (just 5,318 dwellings – a shortfall of 682 dwellings).
- 1.8 In addition to there being a shortfall in land supply for the assumptions made by the Council, the Council’s own Viability Assessment Update (EB/046) published in December 2014 is of critical importance. It indicates that housing development in the City Centre is presently unviable under current market conditions, as is development within other inner and southern areas of

Bradford when additional policy and brownfield land costs are taken into account. This is set out in Tables 4.7-4.12 of that document.

- 1.9 In addition to land supply and viability constraints, each of these strategic sources is in areas where the market demand for housing is low. Certainly there is no evidence provided by the Council that the market in these locations are capable of sustaining such levels of housing delivery, particularly in the context of such low levels of delivery in previous years, even when one looks beyond the recent recessionary period.
- 1.10 In the absence of any evidence provided by the Council, CEG has commissioned Allsop (a specialist and locally based firm of residential agents active in the Bradford and wider Yorkshire market) to provide an analysis of the housing market in these areas of Bradford. This assessment is contained at Appendix 2 to this statement and considers the viability issues raised by the DTZ report in further detail. It demonstrates that there has been a paucity of residential development in the City Centre since 2008, principally on account of low values and rents, poor viability and, importantly, low demand. They conclude that this will unlikely change in the foreseeable future
- 1.11 The report further demonstrates that current house building activity and rates of sales in southern Bradford reflect unsustainable rates of sales of less than 1 dwelling per month, compared to a regional norm of at least 3. The report also raises issues about the attractiveness to the market of the many smaller sites identified in the SHLAA , due to the reduced activity of smaller developers and house builders and the difficulty in financing such sites in low value areas. The over-riding conclusion of this report is that there is no early prospect of the acknowledged viability issues in central and southern Bradford easing.
- 1.12 The assumed deliverability of the proposed urban extension at Holme Wood has also not been justified by the Council in any proper evidential way. The Holme Wood and Tong (non-statutory) Neighbourhood Development Plan was published in final form by the Council in January 2012. This identifies 3 Green Belt locations to the east of the existing housing estate which jointly could accommodate up to 2,100 dwellings. Since the publication of the plan, we are not aware of any further meaningful work that has been undertaken by the Council, or indeed any other party, which has sought to demonstrate how these sites are capable of being delivered.
- 1.13 The wider Holme Wood estate is acknowledged by the NDP as being the largest social housing estate in the District. The NDP concludes that it suffers from a poor reputation and anti-social behaviour and part of the justification for the urban extension is that it will generate value for reinvestment in the regeneration of the wider area, including the delivery of 600 additional dwellings as infill within the existing estate, beyond the wider urban extension. The NDP also envisages the urban extension delivering a major new link road, linking the site and the wider Holme Wood estate with the A650. Given these

major infrastructure and wider funding requirements, in the absence of any evidence, it is unrealistic to conclude that the Holme Wood Wood sites are deliverable during the plan period, particularly given the wider conclusions reached on the wider viability and market attraction of house building in this part of the District. As the Allsop analysis has concluded, certainly the delivery of 600 units within the existing estate is particularly unrealistic from a market perspective.

- 1.14 In conclusion, CEG consider that the deliverability and market attraction of many of the Council's identified 'Strategic Sources' is unrealistic and these sources will certainly not deliver the level of housing that the Council anticipates during the plan period. This point is addressed further within CEG's hearing statement in respect of Matter 4C which considers the overall distribution of the housing requirement.
- 1.15 The acknowledgement within HO2 that local Green Belt releases will form an important element of supply is supported. Given the limited availability of non-Green Belt land, such releases in sustainable locations will in fact have to play a critical role in meeting the full housing needs of the District. Such releases should be delivered at an early stage in the plan period to help address the backlog of unmet housing needs in recent years, as is evidenced in Table HO1 of the CSPD.

b) Is the policy founded on an up-to-date, accurate and comprehensive assessment of housing land availability, including SHLAA?

- 1.16 This has been addressed in our response to Question 4.2a above.

c) Is a better strategic framework needed for designated Growth Areas?

- 1.17 It is agreed that a better strategic framework is required for identified growth areas. Such a framework should focus on the ability of these areas being able to deliver the required homes planned for these areas in the plan period. In redefining such a framework, there should be less emphasis placed upon the defined Regional City area. In that area, it has been demonstrated that it is not possible to deliver the number of homes required, either from a land availability, or a market, perspective. Any revised framework should re-focus on the proper growth of other sustainable and strategically important locations, such as Burley in Wharfedale, where there is suitable land available which can be developed sustainably to meet the area's needs.
- 1.18 In doing so, the revised framework should therefore make reference to Burley-in-Wharfedale as a Growth Area at part B.1.iv) of the policy, as those settlements identified in that part of Policy HO2 correspond with the identified Local Growth Centres in Policy SC4. CEG's case for Burley-in-Wharfedale being identified as a Local Growth Centre (as was the case with the previous

CSFED) is addressed in their statement in respect of Matter 3.2 (Policy SC4 - Settlement Hierarchy).