



Bradford Local Plan Core Strategy Examination - Hearing Statement

Representations on behalf of CEG Land Promotions Ltd (CEG)

Representor Reference: 495
Date: February 2015

Matter 7B: Managing Housing Delivery

Key issue:

Does the Plan provide a clear, effective and soundly based framework for working together, managing housing delivery, promoting sustainable transportation, protecting, maintaining and enhancing the high quality environment within Bradford, ensuring an adequate supply of sustainable minerals and waste management, and achieving good design, which is fully justified with evidence, positively prepared and consistent with the latest national policy?

Question 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?

- 1.1 Reference made within the supporting text to Policy HO4 which places a focus on the early release of deliverable and sustainable sites which are not dependent on the provision of significant new infrastructure is generally supported. However, there can be no justification for the phasing or “holding back” of sites given that the Council have not been able to demonstrate a 5 year housing land supply either now or in the first 5 years of the plan. Indeed Appendix 6 of the Core Strategy clearly shows a backlog in housing delivery right up until the final year of the Plan period. This is contrary to paragraph 47 of the NPPF and it is unsound.

b) Is the approach to phasing in line with national guidance (NPPF; 47)?

- 1.2 No. The NPPF does not promote the phasing of the release of land. The NPPF promotes sustainable development and paragraph 15 clearly states that “development which is sustainable can be approved without delay”
- 1.3 HO4B in particular is contrary to NPPF paragraph 47 which requires the identification of enough deliverable land within the first 5 years of the Plan. It is not clear how the policy requirement for DPDs to identify housing land for the first 8 years and then for the remaining seven of the 15 year period, in two

phases will enable the delivery of the identified housing backlog or the housing numbers required to catch up with the housing need by the end of the Plan period. There is no justification or reason for the Council's identified 2 phases given that they are unable to meet their housing needs until the final year of the plan period.

c) Would the phasing approach lead to shortfalls in housing provision, putting at risk 5-year housing land supply?

- 1.4 Yes. This approach does not facilitate the timely allocation of much needed sites for housing or the timely delivery of housing in line with the identified needs. There is no five year land supply at present. The housing trajectory presented at Appendix 6 of the Plan suggests that there never will be a 5 year land supply including the 20% additional allowance required by the NPPF due to the history of under delivery.
- 1.5 The policy gives priority to the type of sites that are currently available, previously developed land and land in regeneration areas and not to delivering the numbers that are required. A new approach is required that promotes sites that do not suffer the viability and deliverability problems associated with much of the regeneration areas and previously developed land most notably the land that falls within the value bands 4 and 5 identified in the Council's Viability Assessment (EB046).

d) Does the proposed approach to phasing properly recognise infrastructure requirements (including cross-boundary infrastructure requirements)?

- 1.6 It is unclear how the phasing approach relates to infrastructure delivery.

Question 7.6: Policy HO5 – Housing Density:

e) Is the approach to housing density in accordance with national policy?

- 1.7 Policy HO5 as presently drafted, requiring developers to make the best and most efficient use of land, is supported by CEG, as is the recognition that density targets must related to individual sites and their surroundings in order to achieve a workable and sustainable layout, as well as local circumstances including the type and size of housing required to meet local needs and market demand. This approach is largely in accordance with paragraph 47 of NPPF.
- 1.8 The flexibility which policy HO5 appears to suggest is also welcomed. It should be strengthened in order to confirm that minimum densities comprise targets, rather than standards, and formalise the ability to deviate from target densities to allow for, and accommodate, local circumstances, housing need, and site constraints.

f) Would the proposed approach adversely affect 5-year housing supply?

- 1.9 There is no five year supply provided for by this Plan. But apart from this issue, the effect on supply by the policy would depend on how flexibly the policy was applied.

g) Should the policy introduce more flexibility to address viability and other considerations?

- 1.10 Yes, in particular viability, deliverability timeframes and constraints, local market considerations and potentially site characteristics.

h) Is there sufficient evidence to justify the specific density targets for particular areas?

- 1.11 No. It is not clear how the density calculation was calculated and whether 30dph is a net or gross figure.

Question 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?

- 1.12 Maximising the use of previously developed land is a key element of sustainable development and efforts to make the best use of deliverable, brownfield land for the provision of new homes is supported as a key ambition of Bradford's Local Plan.
- 1.13 However, the NPPF (paragraph 111) and NPPG (ID: 10-009-20140306) seek to "encourage" rather than "prioritise".
- 1.14 It is recognised that the NPPF supports Local Authorities to set targets in this respect but this should not be at the expense of deliverability of housing for the area (as would be the case here), nor at the expense of the identification of a 5 year land supply.

j) Will the proposed targets stifle development and undermine meeting housing need and supply?

- 1.15 It is likely that the setting of these targets will lead to a shortfall in sites that can actually come forward for development within the Plan period. This view is confirmed by the findings of the Council's viability assessment (EB046). This identifies that much of the areas identified for development by the plan are in areas identified as unviable for development without any policy-on costs (value band 5 areas) or unviable once affordable housing costs have been added and/or policy-on costs.

- 1.16 The development rate and the achievement of meeting objectively assessed housing needs should not be stifled or prejudiced on the basis of target rates for the development of previously developed land. Greenfield land allocations should not be prejudiced on this basis if objectively assessed housing needs are to be met. This is contrary to the NPPF.

k) Are the proposed targets fully justified with available evidence?

- 1.17 A detailed review of the 2013 SHLAA demonstrates that a number of those sites being relied upon to meet the targets set out within Policy HO6 will not be deliverable or viable. The district wide target of 50% of all development being delivered on brownfield sites is therefore not considered to provide a realistic or deliverable baseline which will guarantee the delivery of objectively assessed housing needs.
- 1.18 In addition the SHLAA cannot currently identify enough land to meet this 50% target.

l) Do the proposed targets properly reflect viability considerations, or should the policy provide more flexibility to ensure that it is effective?

- 1.19 As stated above the Council's Viability Assessment suggests that the targets cannot be justified as it cannot be demonstrated that these targets are deliverable and able to meet the housing needs as identified in the Plan.
- 1.20 This policy should therefore be modified to "encourage" the re-use of previously developed land and remove the specific targets that would render the Plan undeliverable.

Question 7.8 Policy HO8 – Housing Mix

Question 7.9 Policy HO9 – Housing Quality

Question 7.10 Policy HO10 – Overcrowding and Empty Homes

- 1.21 CEG has no comments to make at this time on Policies HO8, HO9 or HO10