

Bradford Local Plan

Core Strategy Examination

Matter 7b: Housing – Phasing & Release of Housing Sites

Further Statement Clarifying Phasing Policy and 5 Year Land Supply Figures / Calculations

Date: 18th March 2015

Venue: Victoria Hall, Saltaire

- 1.1 During the course of the discussions on Policy HO4 the Inspector asked for clarification of a number of matters including the different total and annualised calculations of the 5 year land supply requirement under several different scenarios. Clarification was also sought over which housing trajectory the Council were now recommending be included within the Core Strategy. Finally during the hearing sessions a number of possible amendments to the policy and / or text were discussed and these are outlined in this note.
- 1.2 Within the Core Strategy, the Council in Policy HO4 sets out its proposal to phase the release of housing land. Policy HO4 states that the plan period will be split into an initial 8 year phase and a second 7 year phase. It sets out a number of principles to ensure that the choice of sites which are released in the first phase has regard to a number of factors including the need to maintain a 5 year land supply of deliverable sites and the need to provide a range and choice of dwellings types. It also states that the phasing of sites should have regard to the targets for development on brownfield land, the need for regeneration within the urban areas and the co-ordination of development with the provision of new infrastructure. It is not the purpose of this note to discuss the merits of this approach – this is covered within the Council’s further statement (PS/E007b)

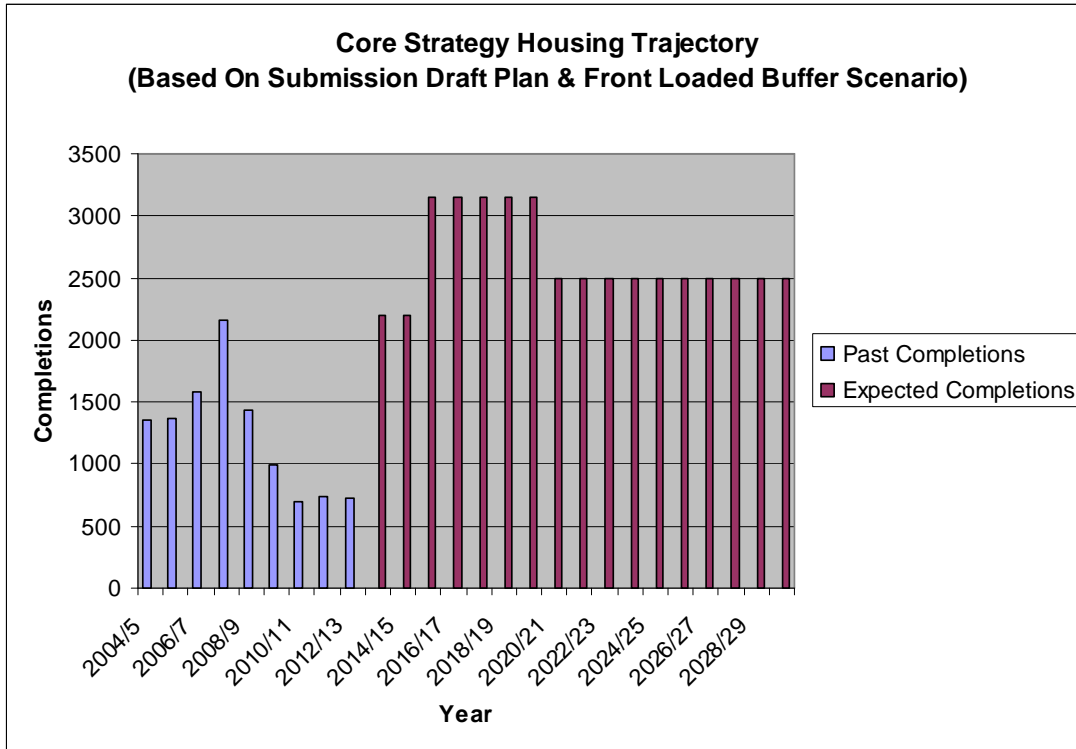
5 Year Land Supply Calculations and Resulting Revised Housing Trajectory’s

- 1.3 One of the issues raised in both representations and during discussion at the Matter 7b hearing was whether the Council’s proposed phasing policy would undermine the maintenance of a 5 year land supply of deliverable sites. The Council considers that a 5 year land supply would not be undermined because of both the quantum of land which would be released within the first phase and because of the criteria which are set out within Policy HO4 which will influence the selection of which sites are placed within the first phase. However, before this matter can be assessed either way, it is important to establish first what the 5 year land supply requirement would be and to map the housing trajectory which would result. The table below sets out, as requested by the Inspector, the 5 year land supply requirement under different assumptions – both as a total requirement and as an annualised figure

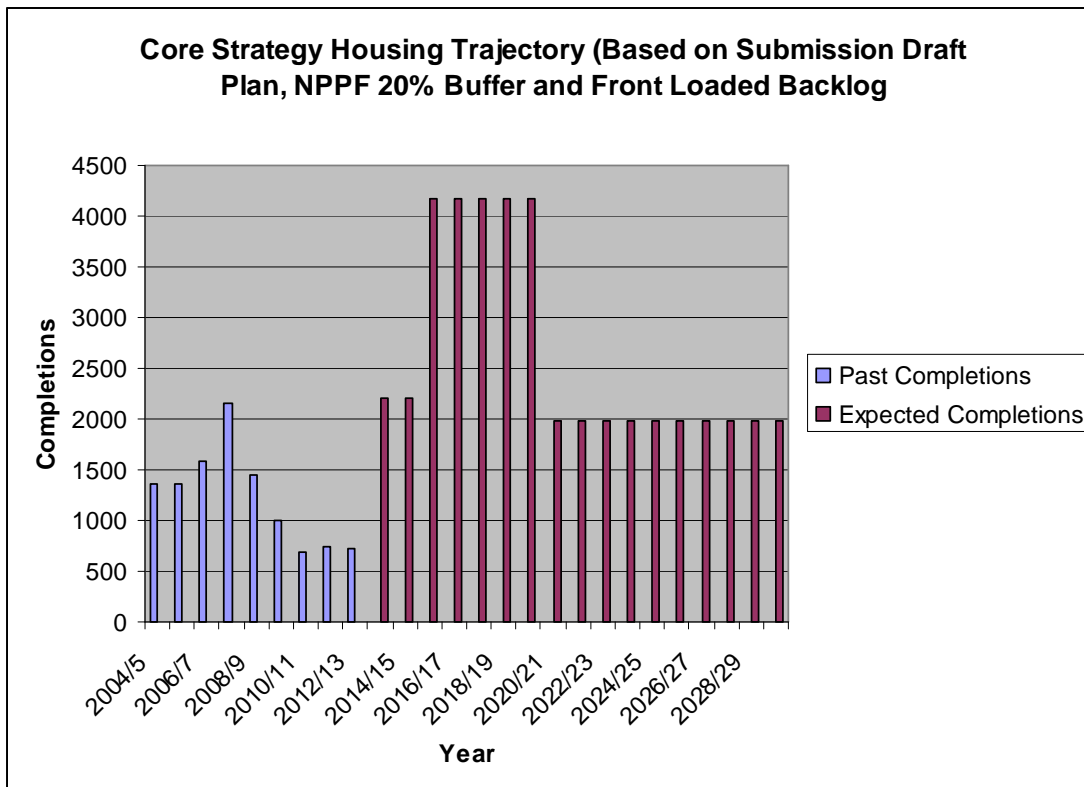
Basic 5 year requirement		(2,200 x 5)	
Total Requirement	11,000	Annualised 5 year target	2,200
5 Year Requirement plus 20% buffer		11,000 + (11,000 x 0.2)	
Total Requirement	13,200	Annualised 5 year target	2,640
Option A: 5 Year Requirement plus 20% buffer plus backlog ‘resolved’ over whole plan period to 2030		13,200 + (7,687 / 15)	
Total Requirement	15,762	Annualised 5 year target	3,152
Option B: 5 Year Requirement plus 20% buffer plus backlog ‘resolved’ over 5 years		(13,200 + 7,687)	
Total Requirement	20,887	Annualised 5 year target	4,177

- 1.4 The graphs below show the resultant housing trajectory’s from the two main options. The trajectory shows the degree of uplift in housing completions in the 5 year period and also illustrates how these annualised delivery rates compare to what has been achieved in the previous period going back to 2004 (upon which the backlog is calculated).

Option A



Option B



1.5 In determining the best approach to take it is suggested that regard should obviously be had to Government policy as set out within the NPPF and NPPG, particularly with regards to ensuring that plans are positively prepared, that they boost the supply of new housing and that they put in place sufficient land. However the NPPF also suggests that regard should also be had to whether the plan proposals are deliverable – in this case whether the completion rates are deliverable (NPPF paragraph 182 requires that plans to be considered effective must be deliverable).

- 1.6 Finally regard should be had to whether there would be any undesirable implications of front loading supply to the degree indicated. The key concern for the Council is that the existence of a backlog relates to unmet need within the urban areas of the district but these are areas where economic conditions are weakest and where viability will be most challenging in the first 5 years. If front loading supply were to lead to large land releases and delivery in the suburbs and outer areas such as Wharfedale and Airedale this may not make much of a contribution to meeting need in the urban areas and could even lead to a sucking in of demand from other areas outside of the district.
- 1.7 The Council therefore suggests that option A which includes a 20% buffer and part of the backlog within the 5 year land supply would be preferable to option B. It has a greater chance of being deliverable and would result in a lower risk of re-directing demand from other areas. At the same time it would produce a very significant uplift in housing delivery compared to recent years and would make a significant contribution to the task of resolving unmet need as well as need which arises from household growth in the first part of the plan period. It would also align with the phasing approach in Policy HO4. Policy HO4 would release land for over 22,000 houses which would represent a surplus of 6,691 over and above the 5 year land requirement of 15,762. Any windfall, even if modest, would further add to this supply.
- 1.8 To further aid consideration of which trajectory and assumptions would be most appropriate the Council re-iterates that the 5 year land supply based on SHLAA 2 was assessed to be 8,554 dwellings. This is made up of sites which either have planning permission for residential development, which are deliverable but as yet unimplemented former RUDP housing sites or sites in locations which comply with current RUDP policies and designations. Also to aid consideration the Council has included a table below which compares the proposed phase one land release to the different 5 year land requirement calculations. Clearly the phase 1 land supply release and thus degree of surplus depends on the length of the first phase and a larger release and surplus could be obtained if the first phase were to be extended to 9 or 10 years:

	Total Requirement	Phase 1 Land Release	Surplus
Option A: 5 Year Requirement plus buffer plus backlog spread over 15 year plan period	15,762	22,453	6,691
Option B: 5 Year Requirement plus buffer plus backlog resolved over first 5 years	20,887	22,453	1,566

- 1.9 For comparison a 10 year first phase would result in a land release which would provide for 28,067 houses (10/15 x 42,100) which in turn would provide a surplus of 12,305 over and above the Option A 5 year requirement.

Potential Changes to Text and Policy

- 1.10 The following changes are put forward for consideration and relate to both the discussion during the hearing, representations made at submission draft and also the need to ensure that the policy is clear and is flexible.
- 1.11 The first point for clarification raised by the Inspector relates to second sentence of part B of the policy. Taken literally this could imply that the Allocations DPD's and AAP's need only allocate land for the first 8 year phase. This was not what was intended and therefore a second sentence could be added to make clear that these DPD's will allocate sufficient land to meet 7/15 of the relevant plan wide requirement within the second phase.

- 1.12 The next point raised in the representations and in discussions at the EIP hearings is whether the policy would undermine delivery in cases where larger and more complex sites need early release and a degree of certainty to enable forward planning, and the securing of required infrastructure investment. While there is nothing within the policy which would prevent the placement of such sites within the first phase it is considered that it would be useful to add a criterion to the policy to emphasise that there will be a need to release larger and more complex sites earlier and to this end a policy addition similar to that contained within the Leeds Core Strategy phasing policy is proposed.
- 1.13 The next point relates to cross boundary issues. The Council are committed to continued dialogue and joint working with neighbouring local authorities as work on the Allocations DPD progresses. There may in such work be occasions where the decision on which phase a site is placed will be influenced by cross boundary discussions. This will allow for the impacts of development across boundaries and within key corridors to be managed more effectively. An amendment to the supporting text could be made to emphasise this point.
- 1.14 Finally the Council draws the Inspector's attention to the Leeds Core Strategy phasing policy which includes a specific provision for land from later phases to be released if a 5 year land supply shortfall were to occur. The Council considers that the scale of phase 1 land release and the site phasing criteria should ensure that a 5 year land supply shortfall does not occur. However the insertion of a policy criterion as set out below and in similar vein to Leeds's phasing policy would give absolute certainty that such a shortfall would not go unresolved. A persistent shortfall would be defined as one which occurs over 2 annual monitoring reports.

“The Council will maintain a five year supply (plus NPPF buffer) of deliverable housing sites through considering release of the subsequent phase of sites to help address any persistent shortfall.”

APPENDIX 1 : POSSIBLE CHANGES TO THE CORE STRATEGY POLICY HO9 AND SUPPORTING TEXT

The following changes are put forward for consideration with text additions in bold, underline and deletions struck through:

Policy HO4: Phasing the Release of Housing Sites

- A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the release of land within the Local Plan will be phased.
- B. The plan period will be split into 2 phases with phase 1 covering the first 8 years and the second phase the final 7 years of the plan period to 2030. DPD's will therefore need to allocate sufficient land to meet 8/15 of their housing requirement as specified in Policy HO3 within the first phase **and 7/15 of their housing requirement within the second phase.**
- C. Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road DPD's but will be based on the following principles:
1. The need to have regard to delivering the overall housing requirement in line with Policy HO1;
 2. The need to maintain a 5 year supply of deliverable sites as required by the NPPF;
 3. The need to ensure that within each phase the sites allocated will provide for a range and choice of dwellings of different types, sizes and tenures which will meet local need;
 4. The need to meet the targets for development on brownfield land as set out in this document;
 5. The need to prioritise and not undermine proposals for urban regeneration within the Regional City of Bradford and in Keighley;
 6. The need to ensure that the scale and timing of development within the different strategic planning areas of the district is co-ordinated with the provision of new infrastructure;
 7. The need to ensure an even delivery pattern within smaller settlements and rural areas where sites are aimed at meeting local and affordable housing need over the whole period of the LDF

D. Consideration will be given to the need to bringing forward large and complex sites within the first phase where this would aid delivery or help to secure required investment and infrastructure;

E. The Council will maintain a five year supply (plus NPPF buffer) of deliverable housing sites through considering release of the subsequent phase of sites to help address any persistent shortfall.

5.3.70 The decision to identify two phases and to make the first phase of a longer period than the second has been taken to ensure flexibility within the land supply and support delivery. An eight year first phase will also ensure that the use of a phasing policy will not undermine the ongoing existence of a 5 year land supply of deliverable sites. Based on the LDS programme and the expectation of achieving an adopted Core Strategy by ~~February~~ **the end of** 2015 it is envisaged that the first phase will run from ~~February 2015 to February~~ 2023.

5.3.71 Within DPD and strategic planning sub areas, careful consideration will need to be given to assigning within each phase a variety of site types and site locations to meet the needs for different types, sizes and tenures of housing and this will mean that although there will be a focus on brownfield sites some greenfield sites will need to be assigned to the first part of the plan period. The results of the SHLAA will also be used to ensure the potential

timing of delivery on sites is also taken into account. The Local Infrastructure Plan will also be a key input into the phasing process. To be clear, although the Council wishes to encourage the take up and delivery of previously developed land, there will be no bar on a particular type of site being placed within the first phase.

5.3.72 Recognising the relatively long lead in time and technical issues associated with bringing forward larger more complex sites for residential development, which will often necessitate the need for phasing and the provision of infrastructure, consideration will be given to opportunities to bring such sites forward for development, as part of the first phase, where this is appropriate and consistent with the overall strategy.

5.3.73 While each of the 3 DPD's which will be allocating housing sites will need to allocate sufficient land in the first phase to meet 8/15 of their plan wide housing requirement it will not be a requirement to phase sites on a settlement by settlement basis. This would not be practical since some settlements will face more significant infrastructure issues while immediately deliverable land supply will also vary.

5.3.74 The overall principles for the phasing approach within the Local Plan are therefore set out in this document within Policy HO4. The Housing Implementation Framework included in Appendix 6 also sets out how the Council will monitor delivery and this includes the implications of under achievement of on housing completions and brownfield development targets for the phasing approach. **The Council will also consider the release of phase 2 sites in the unlikely event of a persistent shortfall (defined as being over 2 successive monitoring year periods) in 5 year land supply.**