

Bradford Local Plan

Core Strategy Examination

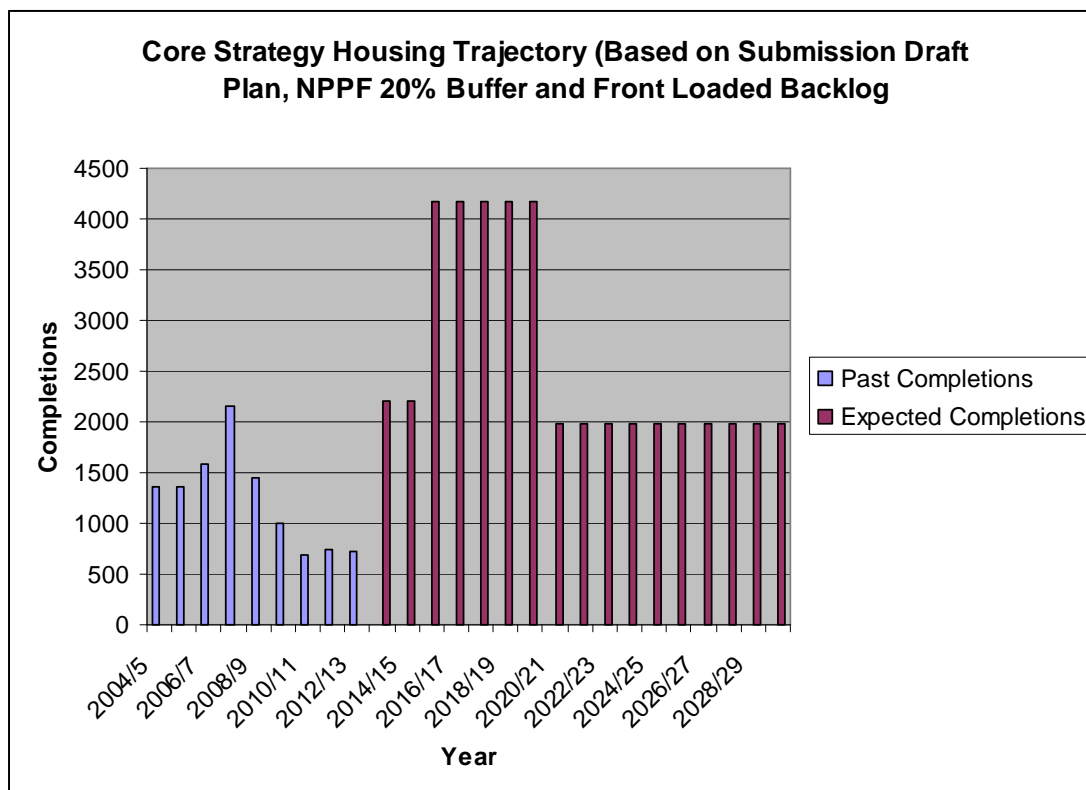
Matter 4b: Housing Supply

Further Statement Regarding the Implication of Meeting The Backlog of Unmet Need Within 5 Years

Date: 18th March 2015

Venue: Victoria Hall, Saltaire

- 1.1 During the course of the discussions on Policy HO2 the Inspector asked for a note which outlined the implications of meeting the backlog of unmet need within 5 years. This note therefore presents the trajectory of delivery which would be implied by such an assumption and the extent to which the meeting in full of the backlog over 5 years is feasible. It also addresses the potential indirect effects of pursuing such a policy.
- 1.2 Within the Core Strategy's housing chapter the Council has presented data relating to past performance on net additions to the dwellings stock over the period 2004-13 and compared this to planned delivery as set out in the statutory development plan. This backlog amounts to some 7,687 dwellings.
- 1.3 The existence of a backlog has a number of policy implications, for example it affects the calculation of the 5 year land supply position. However the main issue is the extent to which the backlog is indicative of unmet need for housing. The Council has compared the plan based backlog against the shortfall in new homes which is apparent by contrasting net housing completions since 2004 with household growth over that period (with data here taken from the latest household projections). It is clear that there is a significant element of unmet need and this is further underlined by indirect indicators of housing market stress such as the levels of over crowding in certain parts of the district. Moreover the increased number of households suffering from overcrowding has occurred precisely where one might expect it to – in the inner urban areas where the effects of a young age structure and immigration are driving household growth.
- 1.4 The Government's policy as set out within the NPPF and its technical guidance within the NPPG is clear that Council's should assess objectively and robustly the need for new homes, that this should include an assessment of past housing delivery, that any currently unmet need should be accounted for in future provision. It then goes on to suggest that Council's should plan positively to meet the need within their areas and boost supply unless the adverse effects of doing so would significantly and demonstrably outweigh the benefits (paragraph 14).
- 1.5 The Council's preferred approach would be for the backlog of unmet need to be accounted for over the plan period as a whole. However if the backlog were to be met over the first 5 years this would have a number of impacts. It would firstly increase the 5 year land supply requirement to 20,887 dwellings. This total is comprised of the basic 5 year requirement over 5 years of 11,000 dwellings, a 20% buffer adding a further 2,200 dwellings, and the backlog of 7,687 dwellings. Over the first 5 year period this would imply and require delivery of 4,177 dwellings per annum. The resulting housing trajectory is given below.
- 1.6 What is immediately apparent is how completely divorced the implied delivery rate is from the recently achieved rates of delivery which have been between 700-900 dwellings per annum. The NPPF at paragraph 182 makes clear that in order to be judged sound plans must be considered effective. Within the paragraph effective is defined as follows, "the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities."
- 1.7 The Council considers therefore that the approach which produces a trajectory indicating delivery front loaded to the tune of over 4,000 dwellings per annum would only be justifiable if there was some policy intervention, step change or evidence to suggest that such a level of delivery rate in the first part of the plan was feasible. In the Council's view there is no such evidence. The current supply of deliverable land (as set out in SHLAA 2) which would be the starting point for increased delivery amounts to just 8,554 dwellings. In the period before the Allocations DPD is adopted it is entirely possible that this supply may increase partly as a result of permissions which may be granted and partly as currently undeliverable sites may begin to be implemented as the housing market and economic conditions slowly improve. However it is unlikely that this would be sufficient to produce what would in effect be a five fold increase in delivery as compared to recent completion rates.



- 1.8 In short the Council considers that if the trajectory which includes the full backlog within the first years is adopted then it would render the Core Strategy unsound as the assumed rates of delivery could not be achieved.
- 1.9 However, over and above the concerns over the effectiveness of such a policy, it is considered that such an approach would also lead to undesirable, and worse counter productive effects which would render the plan unsustainable. During the course of the Examination hearings, considerable debate and discussion was had over the viability of development within the main urban areas under current market conditions. Developers warned of the challenges of securing delivery within the Regional City particularly within the early part of the plan period.
- 1.10 The Council challenged the degree of pessimism on delivery prospects but acceded that in the early part of the plan period delivery within the Regional City would be more dependent on direct and direct support from public sector agencies.
- 1.11 These matters are however crucial when considering the desirability of pursuing and attempting to achieve a radically front loaded delivery trajectory as it is fairly self evident that such a front loaded delivery could only be achieved by focusing land releases and delivery on the peripheral and higher value areas of the district. Even if this could be achieved at the very high quantum required, it is counter intuitive to do so as it would not be actually serving to meet the backlog of unmet need which is the sole reason for including the backlog in the first five years in the first place. What such an approach would be doing would be to meeting the much smaller scale of need within the outer areas with the rest of the development serving to meet or suck in demand from other outlying areas including areas outside the district.
- 1.12 In addition to the problems outlined above the pursuance of such high delivery rates in the early part of the plan period would mean housing delivery out pacing the Council's ability to plan for service and infrastructure improvements. It is hopefully self evident that the prospects for securing funding for transport and infrastructure improvements will be at their worst in the first 5 years of the plan period but will gradually improve as the period progresses. This is for 3 logical reasons. Firstly the second half of the plan period is likely to see less restriction on public sector investment and funding as the national budget

deficit is reduced or eliminated. Secondly economic and market conditions are likely to be improved in the second half of the plan period thus improving both the deliverability of sites and the ability of sites to fund infrastructure via both S106 contributions and potentially through CIL. Thirdly the Council will have had time to plan for and manage, in partnership with service and utility providers and also with neighbouring local authorities, the changes needed to support growth and ensure that it is delivered in a sustainable way. It will have had time to carry out a range of work including corridor based transport studies as part of the Allocations DPD.

- 1.13 Thus to conclude the Council fully accepts that the general principal as set out in Government policy is to both boost supply, bring forward development and sites as soon as possible and to resolve unmet need. However the whole point of seeking to meet backlog is to meet the specifically identified unmet need. However the meeting of the backlog of need which in Bradford's case is focused within the urban areas is unlikely to be fully achievable within the first five years of the plan period. A trajectory which envisaged delivery at rates at over 4,000 per annum in the first 5 years would therefore fail to meet the need where it arises and would in any case be undeliverable. The Council would finally recommend that the Inspector take account of the outcome of the Leeds Core Strategy EIP where it was accepted that delivery rates are likely to gradually step up in scale as the plan period progresses and where a phased approach to land release has also been deemed to be appropriate. There is no evidence to suggest that the prospects for a achieving and achieving in a sustainable manner a radically front loaded delivery are better in Bradford than in Leeds.