

## **Bradford Core Strategy Examination in Public**

### **Responses to Council Homework:**

**PSF / 033**

**PSF / 034**

**PSF/ 061**

**PSF / 063**

Our representations on these Further Statements by BMDC are made in the context of the evidence already submitted on behalf of the housebuilding industry in relation to the overall plan period housing requirement. NLP presented a case for an enhanced figure of circa 45,000 dwellings. Johnson Brook essentially supported the methodology and general conclusions in the NLP submissions but sought to add additional components to the overall requirement relating to specific market signals and achievable job growth.

### **PSF / 033, 034 and 063:**

In the context of the above introductory paragraph and the relevant evidence given on behalf of the housebuilding industry higher requirement scenarios are advocated following the application of the three stage need assessment process. The collective work on the requirement produced on behalf of the housebuilding industry and earlier detailed work by Johnson Brook on the 5 year land supply in Bradford leads us to a conclusion that the five year land supply is at best equivalent to 2.0 years.

**PSF / 034** advocates spreading the 7,687 dwelling backlog over the whole of the plan period, after the application of the agreed 20% buffer (Liverpool/Sefton methodology). On the Council's annual base requirement of 2,200 dwellings this equates to a five year requirement of 3,152 per annum. NPPG advocates the need to deal with any undersupply within the first 5 years of the plan period where possible (Sedgefield methodology). The Council calculate that this would result in an annual requirement over the first 5 years of 4,177 dwellings.

If the evidence submitted on behalf of the housebuilding industry is accepted as a whole or in substantial parts, different base housing need scenarios arise which lead to a higher annual requirement in the first 5 years and across the remaining 10 years of the residual plan period. Full application of the NPPG Sedgefield approach will lead to a challenging annual requirement in the first 5 years in excess of 4,177 dwellings. Using the Liverpool/Sefton approach various requirement scenarios arise dependent on the evidence supplied a) by the Council; and b) on behalf of the housebuilding industry. These range from a minimum of 3,152 dwellings per annum over the first 5 years up to circa 3,700 dwellings per annum.

The national policy imperative in the Framework (paragraph 47) is to pursue a full growth orientated housing strategy. The NPPG advises the Sedgefield approach should be taken when addressing the provision for any backlog and this is a necessarily transformational approach. This is what is needed

in the Bradford context and this should be at the centre of the Core Strategy with a pro-active set of policies encouraging enhanced delivery. However it may be necessary to spread the achievement of the required enhanced delivery over a slightly longer period than the first five years. In particular this will require an enhancement in the number of sites being brought forward and achieving early completions as soon as possible. This is a position which the housebuilding industry have been advocating for some time.

**PSF / 061 – Matter 7b Housing – Phasing and Release of Sites:**

We maintain our firmly held view that there is no reason for the proposed phasing policy. Indeed the arguments in the preceding paragraphs strongly underline this argument. The only logical reason for having any form of phasing policy relates to the delivery of key essential infrastructure. If this were to form the basis of a phasing policy it would need to be a much more sophisticated and pro-active policy incorporating large strategic sites and strategic site groupings into that policy. Such an approach would still not support two clear separate phasing periods.

We await details of the proposed main modifications before making any further comments on this and other matters.