



Bradford Local Plan Core Strategy Examination - Response on Homework Item 35: PSF061

Representations on behalf of CEG Land Promotions Ltd (CEG)

Representor Reference: 495
Date: 21 April 2015

1. This note provides a response on behalf of CEG Land Promotions Ltd (CEG) to the Further Statement (PSF061) prepared by the Council entitled 'Clarifying Phasing Policy and 5 Year Land Supply Figures / Calculations'.
2. Specifically our comments relate to the proposed modification that the Council are proposing to Policy H04, rather than the calculation of the 5 year housing land supply requirement, which has been commented upon both within our statements to the Examination and within our participation in the hearing sessions.
3. It remains CEG's position that in light of the overall housing requirement, the persistent shortfall of delivery that has occurred in recent years and the clear absence of a 5 year housing land supply, there is no justification for the Core Strategy to contain a policy which effectively holds back the delivery of deliverable and sustainable sites until a much later part of the plan period. This remains the case regardless of whether the backlog is addressed either within the first 5 years, or spread across the full plan period. The NPPF (paragraph 47) is clear that "*development which is sustainable can be approved without delay.*" Therefore, it remains CEG's position that Policy HO4 should be deleted.
4. Notwithstanding this position, CEG welcomes the Council's acknowledgement of the need to bring forward large and complex sites within the first phase of the subsequent Site Allocations DPD and proposed insertion of Part D to Policy HO4.
5. The modified wording as drafted does, however, result in the potential for ambiguity in its interpretation and as a result its application. Specifically it is not clear whether for a site to be considered for release as part of the first phase has to be both large and complex or whether the intention is to consider the early release of all large sites and all complex sites. If the latter, which we commend, then the wording should refer to large *or* complex sites. Whilst this potential ambiguity is partially clarified by the proposed insertion of paragraph 5.3.72 into the supporting text which makes reference to the 'relatively long lead in time and technical issues associated with bringing forward larger more complex sites...', the consequence of this approach could potentially prevent appropriate sites coming forward to a timescale necessary to meet the urgent and pressing needs of the District.

6. Regardless of their complexity, it will be essential that in order to deliver the plan's housing requirements in full, larger sites, regardless of their degree of complexity, will need to come forward at an early stage, if they are to contribute the quantum of housing that is expected of them in the plan period.
7. Holding back the release of sites to the second phase (2023-2030) and making an allowance for lead in times before housing on such sites can be delivered, will result in a very constrained and unrealistic time period for delivery, with the likely result being that they would not deliver in full during the plan period, even assuming a higher annual delivery rate than that utilised by the Council in the SHLAA¹.
8. In order to allow for large sites, regardless of their complexity to be brought forward in the first phase, then it is considered that the wording Part D of Policy HO4 should be amended to read as follows:

D. Consideration will be given to the need to bring forward large **and or** complex sites within the first phase where this would aid delivery **in full in the plan period** or help to secure required investment or help to secure required investment and infrastructure”;

9. Paragraph 5.3.72 should then be amended to read:

5.3.72 “Recognising the relatively long lead in time and technical issues associated with bring forward larger **or** 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. **In following such an approach, consideration will be given to ensuring that sites are allocated to ensure that, where required, they are capable of delivering in full in the plan period.**”

¹ The 2013 Bradford SHLAA (SHLAA 2) adopts a maximum annual delivery rate of 40 dwellings per annum.