



THE HOME BUILDERS FEDERATION

Date: 21st April 2015
Consultee ID: 105
Homework Item: PSF059
Word count: 328

BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION

Matter 4a: Housing Requirement (Further Statement on Market Signals)

1. The HBF wish to submit the following comments upon homework item PSF059 produced in relation to the Bradford Core Strategy Examination. The HBF has only commented upon selected homework items. The fact we have not commented upon a particular item should not be taken as agreement with any proposed modification. The HBF reserve the right include additional comments upon any subsequent main modifications consultation.
2. The HBF note the comments within PSF059 which identify how the Council consider market signals have been addressed within the evidence base. The HBF does not dispute that the evidence base discusses the issues (as referred to within our matter 4a hearing statement). It is, however, considered that the evidence base lacks clarity upon the implications of the various market signals including if and how the signals have been taken into account in the derivation of the housing requirement.
3. It is noted that PSF059 suggests that the inclusion of the backlog provides the relevant market uplift (paragraph 1.6). The HBF considers this a flawed argument for a number of reasons, not least because there is no direct correlation between the Council's assumptions and the backlog figure but also due to the fact that the housing requirement is set over the period 2004 to 2030 (see table HO1 of the plan). This period includes the timeframe over which the backlog was accrued and is therefore simply the undersupply during the plan period, it is not an adjustment to account for market signals.
4. The HBF consider that the analysis of market signals provided by NLP and others on behalf of numerous house builders provide a far more robust assessment which is compatible with the NPPF and PPG. This report identifies that a small uplift in the Bradford housing requirement, above that currently proposed, is required. The HBF agree with the assessment made by NLP and others, a point which we have repeatedly made both within our statements and during the examination sessions.

Matthew Good
Planning Manager – Local Plans

Email: matthew.good@hbf.co.uk
Tel: 07972774229