



# THE HOME BUILDERS FEDERATION

**Date: 21<sup>st</sup> April 2015**  
**Consultee ID: 105**  
**Homework Item: PSF061**  
**Word Count: 993**

## **BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION** **MATTER 7B: HOUSING – PHASING & RELEASE OF HOUSING SITES** **(HOMEWORK ITEM: PSF061)**

1. The HBF wish to submit the following comments upon homework item PSF061 produced in relation to the Bradford Core Strategy Examination. The HBF has only commented upon a few specific 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 to include additional comments upon any subsequent main modifications consultation.
2. This note is made in specific reference to PSF061, however, elements of this note are equally applicable to the following homework items;
  - PSF033: Further Statement on the 5 Year land Supply; and
  - PSF034: Further Statement on a revised housing trajectory incorporating a 20% buffer; and
  - PSF063: Further Statement Regarding the Implication of Meeting The Backlog of Unmet Need Within 5 Years
3. The HBF supports the Council's assertion (paragraph 1.2, PSF033) that a 20% buffer is required, this is considered to be in accordance with NPPF paragraph 47. The table at paragraph 1.3, PSF061, illustrates the implications of including the buffer plus backlog over the plan period (Option A) and within the first five years (Option B). The difference for delivery rates in the first five years is an annualised target of 3,152dpa (Option A) and 4,177dpa (Option B). The HBF supports 'option B' as this is considered to accord with the PPG which states;

*'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate' (ID 3-035-20140306)*

It is also noted that the Council has not sought assistance from neighbouring authorities in meeting this undersupply.

4. The Council has recently provided a scale of completions in the range 700 to 900dpa. The achievement of 4,177dpa will therefore be challenging and require a step change in completions. Indeed the Option B requirement of 3,152dpa will also require a significant uplift. This does not mean that the Council should not seek to meet this challenge. The HBF maintain that the phasing of sites will not assist the Council in achieving the significant step change required, rather it is likely to hinder such achievement. It should also be recognised that the HBF and others advocate a slightly higher housing requirement. This inevitably has further implications for the five year supply.
5. The Council identify (PSF061) that the phasing policy would release land for 22,453 dwellings. The table at paragraph 1.8 (PSF061) indicates this would create a surplus of 6,691 dwellings under option A, and 1,566 under option B over and above the five year supply calculation. This table is considered misleading because whilst such surpluses over the five year supply would exist there would also be a need under the phasing for a further 3 years housing supply. This equates to 6,600 units based upon the Council's proposed housing requirement. In this respect there would be a significant deficit under Option B and only a small surplus under Option A. Given the delivery issues within parts of Bradford such a small surplus is unlikely to ensure the five year supply requirements plus the additional three years will be met.
6. The Council makes specific reference to the Leeds Core Strategy phasing policy. Whilst the HBF acknowledge the Leeds policy it is important to recognise Leeds maintained they could identify a five year housing land supply requirement. This is very different to the situation within Bradford where a five year supply cannot be currently demonstrated. The Bradford situation is considered more closely related to that in the recent Rotherham Core Strategy examination, who also could not demonstrate a five year supply. In this case the Inspector considered the imposition of a phasing policy contrary to the requirements of the NPPF and delivery of the housing requirements within the plan.
7. A key issue for the Council in relation to phasing appears to relate to infrastructure provision. The HBF agree that necessary infrastructure is required prior to the development of a site. It should, however, be recognised that the development of a site may facilitate the provision of such infrastructure. In this regard the policy will not only hold back the site but also potential infrastructure. The HBF consider that if the infrastructure can be brought forward through site development there is no reason why a site should be held back. In this regard the main modifications to the Newcastle Gateshead examination provide a useful reference in dealing with such issues (see PSF056).

#### **Potential Changes to Text and Policy**

8. The proposed changes to Policy HO4 and the supporting text are considered an improvement to the submitted version of the plan, particularly parts D and E of the policy and supporting paragraph 5.3.72

and 5.3.74. These changes do not, however, overcome our fundamental concerns with the phasing policy given the desperate need to increase supply within the district.

9. In particular reference to Part E and paragraph 5.3.74 these do not provide sufficient certainty that later phases would be released as the Council would only be obliged to consider further releases. In addition there is no clear indicators pertaining to which phase 2 sites would be released. It should also be recognised that given the current supply issues and the lack of a five year supply, part E and paragraph 5.3.74 would already be invoked. Furthermore paragraph 47 of the NPPF would mean that this policy would be out of date if no five year supply existed.

### **Conclusion**

10. Whilst the HBF considers the proposed modifications to be an improvement upon the submitted plan they are not considered to overcome our original concerns. In this regard the policy is still considered unsound, to ensure soundness the HBF maintains the policy should be deleted, or at very least amended to reflect the modified Newcastle Gateshead policy if infrastructure is identified as a constraining factor.

**Matthew Good**  
**Planning Manager – Local Plans**  
Email: [matthew.good@hbf.co.uk](mailto:matthew.good@hbf.co.uk)  
Tel: 07972774229