

**Bradford Local Plan**

**Core Strategy Examination**

**Further Statement Relating to PS/F063 – Implication of Meeting the Backlog of Unmet Need within 5 Years**

**Date: 29<sup>th</sup> April 2015**

## Introduction

- 1.1 This statement sets out the Council's response to comments made by Johnson Brook in their submission (PS/F077b) to the Council's homework item relating to backlog (PS/F063). Johnson Brook have mistakenly included their comments under the section of their response to PS/F034. However it is PS/F063 which deals with the two issues of firstly what the delivery trajectory would look like if the backlog of past delivery were included in full within the first 5 years and secondly the implications of this including whether such a high rate of completions could be delivered.
- 1.2 Both the Council and Johnson Brook concur that resolving the backlog in full over the first 5 years – the Sedgefield approach – would imply annual delivery for the first 5 years of 4,177 dwellings.

## Response

- 1.2 The Council do not wish to add significantly to the comments it made within PS/F063. PS/F063 indicates the very significant challenge associated with meeting the levels of housing delivery in the first 5 years even under the 'Liverpool / Sefton' approach which spreads the backlog over the full plan period. The Council's view is that it is simply not possible to achieve an increase in dwelling completions from a baseline position of around 900/ annum which is being achieved presently to over 4,000 dwellings per annum, particularly given the market conditions that are likely to prevail over the next few years and also given that the new allocations required to increase delivery significantly will not be in place until the end of 2017. It is, in the Council's view, extremely telling that none of the house builders who have commented on these issues have indicated how completion levels at over 4,000 dwellings per annum could be achieved in the early part of the plan period.
- 1.3 The second main point made by the Council is that the Government policy on backlog is geared towards resolving unmet need. It is not geared towards increasing delivery for the sake of it. None of the house builder objectors, including Johnson Brooks, appear to have challenged the Council's assertion that the majority of unmet need has accrued within the Regional City where household growth, driven by a young age population profile and ongoing immigration, is focused. It is therefore again extremely telling that Johnson Brook have failed to explain how increasing delivery in the early part of the plan period, which could only be achieved by releasing land in the higher value and more peripheral parts of the district, will help resolve the backlog of unmet need in Bradford.
- 1.4 Within statement PS/F077b Johnson Brook make several further assertions with which the Council would strongly disagree. Firstly they fail to acknowledge that there is no absolute requirement within the NPPG to deal with any backlog or under supply within the first 5 years of the plan period. The NPPG makes clear that this is the preferred approach **where possible**. The Council's view is that it is neither possible nor desirable to attempt to meet this backlog over the first 5 years. Secondly Johnson brook suggest that the annual housing requirement for the first 5 years should be even higher given their view and the house building industry's view that the housing requirement should be set at a higher level than that set out in Policy HO1. However in the Council's view the Plan reflects a robust and objective assessment of housing need and that no evidence or coherent argument was put forward at the hearing sessions for any increase to this figure.
- 1.5 Finally Johnson Brook imply that the Council's proposals for over 42,000 new homes and delivery (using the Liverpool / Sefton approach) of 3,152 homes per annum at 31/2 times

recent delivery rates should be increased further in part because it is not 'transformational'. The Council disagrees – delivery of the proposed number of dwellings would be entirely transformational delivering homes at a rate not achieved in modern times, supporting regeneration, providing jobs and increasing access to housing. Rather strangely, Johnson Brook appear to be suggesting that a housing requirement of 42,100 and an annual delivery over the first 5 years of 3,152 new homes should not be considered transformational but their own (and NLP's) slightly higher alternative of 47,000 new homes is transformational.