

**Bradford Local Plan**

**Core Strategy Examination**

**Further Statement Relating to PSF/061 – Phasing of  
Housing**

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

## Introduction

- 1.1 This statement sets out the Council's response to comments made on the Council's statement (PS/F061) relating to its proposed phasing policy (Policy HO4) and to the 5 year land supply calculations.
- 1.2 In particular this further statement relates to the comments made by:
  - Johnson Brook - PS/ F077b
  - Tong & Fulneck Valley Association - PS/F079a
  - CEG Land Promotions – PS/F061
  - HBF – PS/F083c

## Response

- 1.2 The Council consider that the retention of a phasing policy within the Core Strategy is essential to ensure that the scale of development being proposed can be managed in a sustainable way. The NPPF in no way rules out the inclusion of phasing policies and the Council has drawn attention to the support which the policy has received in particular from infrastructure and utility providers.
- 1.2 Johnson Brook in their statement (PS/F077b) indicate that there is no reason for the proposed phasing policy. Clearly the Council disagree with this viewpoint and consider that it has provided a clear justification for the policy both within the Core Strategy and within the statements it has provided and within the hearing sessions of the Examination.
- 1.3 The Tong & Fulneck Valley Association make a number of points within their statement many of which relate to and re-iterate their opposition to development of the proposed Holme Wood urban extension. Clearly the Council disagree with these views. In the Council's view the Association has failed to provide any remotely credible case for the removal of the proposed urban extension from the Core Strategy. Specific points which the Council would make to the Association's submission are as follows:
  - In points 1 and 6, the Association fail to understand the role and purpose of Policy SC5. Policy SC5 sets a sequential approach for the allocation of land (i.e. selection of sites) to meet the proposed housing targets. It is not concerned with the timing of the release of those sites once they have been allocated for development. There is therefore nothing within Policy SC5 to indicate that land designated as urban extensions should be held back to later phases of the plan period;
  - In point 1 it is important to stress that the Council has only confirmed that there is one proposed urban extension within the Core Strategy. It has not ruled out further urban extensions being identified within the Local plan (including the Allocations DPD);
  - In response to point 4 the Council would re-iterate that there is no proposal within the Core Strategy or within Policy HO4 to place all sites of one particular type such as green field or green belt in the second phase. The aim of the phasing policy is to achieve a managed and sustainable pattern of development and land release which allows for effective infrastructure planning and supports the aim to prioritise deliverable and developable brown field sites, but which at the same time ensures a land supply which will meet the proposed housing targets and maintain a 5 year land supply. The Council has clearly stated that in order to maintain a 5 year land supply there will be a need to bring forward green field sites and possibly even currently designated green belt sites in the first phase of the plan period. Furthermore given the need to ensure that housing supply is boosted in the areas where there is a significant shortage of

- homes i.e. the Regional City, it is quite possible that all or part of the Holme Wood urban extension would be placed in phase 1 in the forthcoming Allocations DPD.
- With regard to points 7 and 8 the proposed insertion of the new paragraph D is not specifically or solely related to the Holme Wood urban extension. There may be a range of complex sites which require the certainty of early release which paragraph D would provide. Moreover the principal of such an approach has been confirmed as appropriate within other Local Plans including that of Leeds Core Strategy.
- 1.4 With respect to the submission made by the HBF (PS/F083c) the Council would wish to make a number of points in response. Firstly the early part of the HBF statement relates to their view that the housing trajectory should adopt the Sedgefield approach and include the backlog of previous under delivery in full in the first 5 years. The Council have set out clearly elsewhere the reasons why this would not be appropriate. It has explained that in its view it would be inappropriate to include within the plan a trajectory which is clearly undeliverable. It has pointed out that the HBF and others have failed to provide any evidence as how development rates in the early part of the plan period of over 4,000 new dwellings per annum could be achieved. And most significantly it has failed to explain how bringing forward more land in the early part of the plan period in the peripheral higher value areas of the district would actually meet the backlog of need which is mainly centred on the overcrowded urban areas of Bradford.
- 1.5 The HBF also make a slightly disingenuous point about the Council not seeking assistance from neighbouring authorities to meet the undersupply element of the 5 year land supply. It is not clear practicably how this would be achieved but more significantly, as the HBF well know, most of the adjoining local authorities have equal problems and challenges with identifying sufficient housing land and are not in a position where they could assist. Some do not themselves have a 5 year land supply and all are also subject to the same current market conditions as Bradford. It is also unclear as to how the HBF considers that allocating more land in the higher value areas of Leeds or other adjoining authorities would help to meet the backlog of need in the inner urban areas of Bradford.
- 1.6 At points 4 and 5 of the HBF submission it is claimed that the Council's phasing policy would undermine delivery of the necessary increase in housing supply. The Council disagree. No evidence is provided by the HBF to justify this assertion. The plan, even with a phasing policy in place would be releasing land for over 22,000 new homes and table at paragraph 1.8 of the Council's statement (PS/F061) it is indicated that this would provide sufficient capacity to ensure a 5 year land supply together with a sizeable surplus. The Council also disagree with the assertion at point 5 of the HBF submission that the surplus of 6,691 dwellings should be reduced by the addition of a further 3 years requirement amounting to 6,6000 units. This would double count years 6-8. The quoted 5 year requirement under both options A and B includes the full housing requirement of 2,200 dwellings for the 8 year phase.
- 1.7 The Council welcomes the HBF's qualified admission that the proposed additions of new paragraphs D and E would improve Policy HO4.
- 1.8 With respect to the HBF's point 9, the Council consider the proposed wording to be appropriate and proportionate and in line with that considered sound by the Leeds EIP process. There is no need at this stage to indicate which sites would be released early from phase 2. This is a decision which would be better taken in the light of the circumstances at the time and the nature of the deficiency in supply and where new supply was most needed.
- 1.9 Finally the Council disagree with the point made by the HBF that the proposed part E would already be invoked by dint of there being a current lack of a 5 year land supply.

This is a strange comment as the Policy is clearly aimed at addressing issues in the unlikely event of a future supply shortage once sites have been allocated within the Local Plan.

- 1.10 Moving on to the submission made by NLP Planning on behalf of CEG, the Council clearly disagrees with the view expressed in their point 3 that there is no justification for a phasing policy. However the Council does concur in the main with the observations made in points 5 and 6 that the proposed modification should be clarified so that it is clear that the sites which are large **or** complex should be considered as potential phase 1 sites. It also agrees that there will be occasions where large sites need to be placed in phase 1 to ensure that they are built out and therefore contribute in full to the housing requirement during the plan period to 2030. NLP's suggested amendments to the new elements of the policy and text (i.e. criterion D and paragraph 5.3.72 are therefore considered reasonable.