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Dear Sir / Madam

Bradford Local Plan Allocations Development Plan Document Issues and Options Consultation

1.0 Introduction

1.1 Thank you for consulting the Home Builders Federation (HBF) upon the Bradford Local Plan Allocations DPD Issues and Options Consultation.

1.2 The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year.

1.3 The HBF does not, at this stage, wish to comment upon the acceptability or otherwise of individual sites. We have not, therefore, sought to address the questions set out within the various sub-area reports. We do, however, have the following general comments upon the *Scope and Content of the Plan* and *Site Assessment Methodology* documents.

2.0 Scope and Content of the Plan

2.1 The proposed content, relating to housing, to be addressed through the Allocations document is generally considered appropriate. This content includes allocations, designations and policies. The policies appear to be largely required to add detail to 'parent policies' contained within the Core Strategy. At the time of writing the Council is still awaiting the Core Strategy Inspector's final report and as such it is possible that these 'parent policies' may be subject to change or even deletion. In this event any lower order policies within the Allocations document may also need to change to reflect this position.

Housing

2.2 Table 1 of the consultation document identifies the relevant Core Strategy policies which require allocations, designations or further policies. Table 1 is replicated below inclusive of our comments upon each area;

Policy Ref	Policy Title	Potential allocation, designation	HBF comment
HO3	Distribution of housing required	Housing site allocations	<p>Agreed, however the need for allocations also emanates from policies HO1 and HO2. To ensure delivery of the requirement set out within HO1 it is achieved it is important a delivery buffer, from all identified sources, is provided. This buffer should be over and above the overall requirement. This is needed to ensure any under or none delivery from specific sites is taken into account and to provide flexibility and choice. This approach was identified as good practice within the recent report by the Local Plan Expert Group (LPEG).</p> <p>To meet the annual housing requirement, set within HO1, it is also important the plan provides sufficient outlets to ensure the levels of delivery required can be met. This will require a wide portfolio of different site typologies delivering simultaneously across the whole plan area.</p>
HO4	Phasing & release of housing sites	Phasing of site release.	<p>This was an area of contention throughout the Core Strategy examination and therefore the Inspector's final report will need consideration. Presuming the policy remains, it is important that it provides sufficient flexibility and choice of sites to ensure that the plan can deliver early in the plan period. The Council will need to ensure that the sites within phase 1 are viable and attractive to the market. This situation will need continuous monitoring.</p>
HO5	Density of housing schemes	Consideration of whether to set area specific density targets to supplement the overarching principles set out in the Core Strategy.	<p>Part 'c' of Core Strategy Policy HO5 indicates density targets for sub areas may be provided. Bradford is not a homogeneous area but the HBF does not consider it essential that every sub area has a density target as general density is already covered by part 'b' of HO5. Such additional targets should only be included where necessary to preserve local character or potentially within areas immediately surrounding transport hubs. It is important that flexibility is maintained</p>

			<p>as a rigid density requirements can have significant implications upon individual sites and a developer's ability to address local market conditions. This could ultimately impact upon viability and deliverability.</p> <p>The introduction of any further density targets would also need to take account of Policy HO8 (which seeks larger homes and accessible homes both of which need larger floor areas and therefore will impact upon densities) and Policy DS3 which seeks development to be within the context of its urban character.</p>
HO6	Maximising use of previously developed land	Prioritising the allocation of viable and deliverable brownfield sites.	<p>The Allocations should encourage, not prioritise, the re-use of brownfield sites. To do otherwise would be contrary to the NPPF.</p> <p>The Council will need to consider Core Strategy Policy HO7 and any amendments resulting from the Inspector's final report.</p> <p>As suggested, in the consultation document, it is important that only sites which are truly viable and deliverable are allocated. To ensure that the plan delivers against its housing requirement will require a wide range of sites to be delivering simultaneously. This will mean that both previously developed and greenfield sites will need to deliver at the same time.</p>
HO8	Housing mix	<p>Consideration of whether to set guidance on housing mix for specific areas or sites based on evidence including local housing market characteristics and local needs.</p> <p>Consideration of possible allocation of sites for specific /special needs accommodation.</p>	<p>The HBF would advise against rigid housing mix policies as these are inevitably based upon evidence which is a 'snap-shot' in time and do not take account of changing needs and market conditions or the effect of Government interventions such as Help to Buy and Starter Homes.</p> <p>Policy HO8, already provides guidance upon mix. Unless there is robust and compelling evidence for specific sub-areas it is not considered further policy is required.</p>
HO9	Housing quality	Guidance on design requirements if justified could be included within site allocations policies.	The HBF does not advocate the use of overly prescriptive design guidance as this can hinder the ability of a developer to respond to site characteristics and market conditions. Any further guidance should be provided solely to assist the development of the site.

			If the Council is seeking to introduce the national space and accessibility standards as alluded within HO9 and discussed during the Core Strategy examination hearing sessions, further evidence will be required in compliance with the PPG.
HO11	Affordable housing	Possible allocation of rural exception sites if required. Inclusion of a criteria based policy for consideration of speculative applications for rural exception development	The HBF has no further comments on the identified issue. The policy may, however, require amending to take account of the forthcoming requirement for Starter Homes.

Green Belt

2.3 The HBF is supportive of the Council undertaking a review of the Green Belt which builds on the work within the *Bradford Growth Assessment*. This was a key element of the submitted Core Strategy and was explored through the relevant hearing sessions. In undertaking the review the Council will need to have full regard to Core Strategy Policy HO3.

2.4 The HBF look forward to reviewing the forthcoming consultation document on this issue in due course.

3.0 Site Assessment Methodology

3.1 The proposed Site Assessment Methodology is generally considered fit for purpose. It is important in applying the methodology that consistency and transparency is employed throughout to ensure it remains clear how and why decisions have been made.

3.2 The HBF has the following comments to specific sections / paragraphs;

Section 6: Establishing the number of housing and employment allocations needed in each settlement.

3.3 Paragraph 6.3 identifies the current supply which will be discounted from the amount of allocations. The HBF has no concerns with elements 'a' or 'b' of the supply, although element 'b' needs to be closely monitored to ensure a site has not stalled.

3.4 Element 'c' relates to sites with permission or allocated in the RUDP, where the SHLAA or other evidence supports deliverability. Whilst such sources will provide a supply consideration should be given to the application of a discount from such sources. This could be based upon the past levels of implementation. This would take account of potential under or none delivery which can occur for a variety of reasons.

3.5 Paragraphs 6.4 to 6.7 consider the issue of losses. This is an imprecise science and as such will need to be closely monitored. To ensure that the plan has sufficient flexibility to deal with either an increase in losses or under-delivery from the sources identified within paragraph 6.3 it is recommended that a buffer of sites be provided to ensure that the plan can meet its requirements in full.

Section 7: General principles in formulating the methodology

3.6 The HBF agrees, due to the imprecision of many factors, that the RAG system is appropriate for site scoring. It is, however, important that the reasons for placing a site into a particular RAG category are clear and consistent.

3.7 The HBF is supportive of the inclusion of potential mitigation factors, as described in paragraph 7.3, being considered in the scoring of sites. It is, however, important that consideration also be given to the impact the mitigation may have upon economic viability and deliverability.

3.8 Paragraph 7.4 identifies that criteria will be used to 'screen out' some sites at an early stage. Such an approach is pragmatic given the number of sites. It should, however, be made clear what screening criteria will be used. Whilst some examples are discussed the full range of criteria should be identified. Section 11 (stage 3) appears to suggest this early screening will be based upon those SHLAA sites with a red rating, unless other evidence is brought forward. This should be made explicit.

3.9 Paragraph 7.5 indicates that the cumulative impacts of sites will be taken into account in providing allocations allowing for adjustment to site selections if impacts cannot be addressed or alternative site package combinations would result in fewer cumulative impacts. If sites are to be removed due to these cumulative impacts it is unclear how the Council will make a decision upon which site or sites are removed. This could be a particularly contentious issue at examination.

Section 11: Stage 3 – initial screening out of sites

3.10 Whilst the HBF has no objections to the principle a clear reason for initial screening should be provided in all cases. This will enable site owners, promoters or developers to consider whether additional evidence can be provided to overcome the reasons for initial screening.

Section 12: Stage 4 – grouping and prioritising remaining sites

3.11 This stage should take account of the criteria set down in Core Strategy Policy HO7, and any amendments which result from the Inspector’s final report. A key omission from the prioritisation is any reference to deliverability. It is no use prioritising sites which are unlikely to deliver during the plan period.

Section 13: Stage 5 – Technical appraisal of sites

3.12 The evidence gathered at this stage should include information supplied by owners, site promoters and developers, including the preferred use of the site.

Section 15: Stage 7 – Assess the cumulative impact of sites

3.13 In common with our comments upon paragraph 7.5 above there is no clear indication of how decisions upon sites to be removed will be determined. This assessment will also need to take account of the commitments identified within Core Strategy Policy HO3.

4.0 Information

4.1 I trust that the Council will find the foregoing comments useful in the preparation of the Allocations DPD. I would happy to discuss these comments further if required. I also wish to be kept informed of any future consultations upon the Local Plan and associated matters.

Yours sincerely,



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