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Dear Sir / Madam,

BRADFORD CORE STRATEGY PARTIAL REVIEW: PREFERRED OPTIONS

Thank you for consulting with the Home Builders Federation on the Core Strategy Partial Review Preferred Options consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The industry is keen to work with the Council to ensure a sound plan is produced which facilitates the delivery of an appropriate number of homes across Bradford. With this in mind we would welcome further engagement with the industry throughout the production of the plan.

Plan period

The Council proposes to extend the Plan period to 2037. The HBF support the Council in extending the Plan period. However, the HBF still considers it may be beneficial to take a cautious approach as the timetable has already slipped from adoption in 2021 to 2022, suggesting that the period should potentially be extended further to 2038 or beyond. This should help to ensure that a 15-year period is retained from adoption as set in paragraph 22 of the NPPF.

Policy HO1: Housing Requirement

The Council have identified the Local Housing Need (LHN) from the Standard Method of 1,703 dpa. The Council have used this figure as their housing requirement, which gives a total housing requirement of 28,951 over the plan period 2020-2037. Part 2 of the policy states that the Local Plan will allocate land for at least

26,150 homes over the plan period. This is a significant reduction from the previous version of the plan, which set a housing requirement of 2,473 dpa.

It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG (ID: 2a-010) goes on to states that these circumstances can include: growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.

The Bradford Economic Strategy 2018-30¹ states that Bradford's economic growth is critical to the wider economic success of the Leeds City Region and the UK. The Strategy seeks to raise the GVA by £4bn and to get 20,000 more people into work.

The Economic Investment Fund is being established to support economic growth and create jobs in the Leeds City Region. The fund, backed by Bradford, Leeds, Wakefield and York councils, aims to provide up to £500 million of private and public sector funding to plug the gap left by the banks in a bid to drive development opportunities.

The Leeds City Region² Local Growth Deal is a £1 billion-plus deal between the LEP and the Government to help transform the Leeds City Region economy. Funding from the Growth Deal has been agreed for schemes such as One City Park in Bradford, where it will support new office space, new jobs and continue improvements to the City Centre.

The Leeds City Region Enterprise Partnership (LCREP) created a long-term Strategic Economic Plan (SEP) it seeks to create upwards of 35,000 additional jobs by 2036. The SEP highlights the major regeneration of Bradford in recent years and states that this is continuing with close to £1 billion of investment in the pipeline. It also goes on to state that better skills, more good jobs and a growing economy are central to the district's plan to improve health, tackle inequality and foster self-reliant and strong communities. The Plan also identifies Bradford as an Urban Growth Centre Spatial Priority Area, where growth will be supported through the development of key infrastructure including residential opportunities.

It is also noted that sites within Bradford are included within part of the proposed M62 Corridor Enterprise Zone (Gain Lane, Parry Lane and Staithgate Lane sites). Again, this highlights support for employment in the area.

¹ Bradford Economic Partnership - a team of senior leaders from key organisations, local businesses, Bradford Council, the University of Bradford, the City Region LEP and the Chamber of Commerce.

² The Leeds City Region spans 10 local authority areas including Bradford.

The West Yorkshire Combined Authority (WYCA) covers five Councils including Bradford and is responsible for the £1 billion West Yorkshire Plus Transport Fund, amongst other projects it plans to fund upgrades to Bradford Interchange and Forster Square. An outline Business Case is also being prepared for the South East Bradford Link Road (SEBLR) to go with an indicative approval of funding from the Combined Authority. The SEBLR is intended to support housing and regeneration targets by unlocking growth sites and improving access.

The Council consider that the Core Strategy's approach to future economic growth can be broadly supported by the 1,703 housing figure. The HBF do not consider this to be the case. PPG is clear that the Government is committed to ensuring that more homes are built and to support ambitious authorities who want to plan for growth. It is evident that there are growth strategies in place for Bradford and that there are funding opportunities available through the Housing Deal, the LEP and the Combined Authority. It is also evident that there are strategic infrastructure improvements proposed that could drive an increase in opportunities for homes to meet local needs. The HBF consider that the housing requirement should be increased.

The HBF also recommend the policy is amended as follows to provide a positive policy: *'Provision will be made within the Local Plan to facilitate a housing requirement of **at least** xxxxx **net** new homes over the plan period 2020-2037 as set out in Table HO1'*.

Policy HO2: Strategic Sources of Housing Supply

This policy sets out the sources of housing supply. It is noted that the policy includes a windfall allowance for 300 dwellings each year. NPPF (2019) is very clear that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. The Council will need to ensure that they have this compelling evidence to support their 300 dpa figure and ensure that it is realistic having regard to the SHLAA, historic windfall, and expected future trends.

It is noted that the Council's previous stance on windfall, during the production of the adopted Core Strategy, was that the Council did not think it would be either appropriate or in line with the principle to plan positively to meet the housing needs of the district to include a windfall allowance within the plan period, and that there is a strong argument that there should be certainty and confidence that an adequate land supply for the plan period is in place, relying on windfall would reduce that certainty³. The HBF recommend that the Council consider whether a change from this previous stance is appropriate, as the 2019 NPPF continues to require the Council to plan positively.

The HBF would also recommend when considering the supply, for example within table HO2, that a slippage or lapse rate is included for all sites that have not yet commenced. This would allow for changes to the deliverability of sites or to changes in the numbers of dwellings to be provided on site.

³ Extracts taken from the Further Statement Relating to Comments made in relation to windfall – Core Strategy Examination 29th April 2015.

Policy HO3: Distribution of Housing Development

The HBF consider that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.

The HBF support the Council in taking a positive approach to additional development on windfall sites.

Policy HO4: Managing Housing Delivery

This policy states that the release of land within the Local Plan will be managed and phased where appropriate. The HBF would generally not support the artificial phasing of sites, unless there is sufficient evidence to justify this approach.

Policy HO5: Density of Housing Schemes

This policy looks for all development to achieve a minimum net dwelling density of 35 dph and at least 50dph net in areas which are well served by public transport and local amenities. This is an increase from the previous minimum density of 30dph.

The HBF consider that this policy would benefit from an element of flexibility allowing developers to take into account local and site characteristics, market aspirations and viability in determining the appropriate density of the site.

Policy HO6: Maximising the Use of Previously Developed Land (PDL)

The HBF support the amendment to the first paragraph of this policy which states that the Council will support, rather than prioritise the development of previously developed land and buildings. However, the policy continues to look for 50% of total new housing development over the Plan period, with the new addition of 'at least'. Whilst the HBF consider that the re-use of previously developed land is generally a positive way to contribute to sustainability, it should not limit the development of other sustainable sites or compromise the delivery of housing to meet local needs.

Policy HO8: Housing Mix

This policy looks for all major residential development sites where 10 or more homes will be provided, or the site has an area of 0.5ha or more to incorporate a mix of housing types, sizes, prices and tenures. Whilst the HBF support an appropriate mix of housing it is important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

Policy HO9: Housing Quality

Part C of this policy requires that all new build dwellings should meet M4(2) and that on major development sites 10% of dwellings should meet the M4(3) standards.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt

the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is noted that Bradford has a generally younger population than seen in nationally with ONS suggesting that around 18.2% of the UK population were aged 65 years or over at mid-2017, compared with only 15% in Bradford. (In fact, the LCR Strategic Economic Plan boasts that Bradford is the youngest city in the UK with nearly a quarter of the population aged under 16). It is incumbent on the Council to provide a local assessment evidencing the specific case for Bradford which justifies the inclusion of optional higher standards for **all** new homes to be accessible and adaptable homes in its Local Plan policy.

Part E of this policy requires all new market and affordable homes should as a minimum meet the Nationally Described Space Standards (NDSS). The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies'*. Local planning authorities should take account of the following areas: Need, Viability and Timing.

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. The HBF do not consider that the Council currently has the evidence to demonstrate that this standard is necessary, and it has not appropriately considered the implications of introducing such a standard.

Policy HO11: Affordable Housing

This policy looks for major residential developments, to provide affordable housing that meets identified local needs at between 15-30%. The policy goes on to suggest the housing mix as 65% affordable housing for rent and 35% affordable home ownership products.

The SHMA (2019) identifies an overall net annual imbalance of 441 affordable homes. The HBF supports the need to address the affordable housing requirements of the borough, however, the NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Therefore, without this viability information, the HBF is not able to comment as to whether this policy requirement is appropriate or not. The HBF would recommend that the Council work closely with the home building industry in preparing the viability assessment to ensure that it is robust and based on appropriate evidence and

assumptions. If the viability work is incorrect it could mean that housing allocations and the housing requirements for the area are not met. Whilst not working closely with the housebuilding industry could lead to prolonged debate at the EiP due to the increased importance now placed on Plan stage viability.

Policy SC7: Green Belt

The HBF would generally support the release of additional land for homes where the Council have provided evidence to identify exceptional circumstances for the release of Green Belt. The HBF would recommend that the Council work closely with the home building industry in identifying sustainable sites to be released from the Green Belt.

Policy ID2: Viability

This policy sets out when the Council will allow the consideration of viability as part of the development process. The HBF do not consider that this policy is appropriate, particularly as it is not possible to determine at present if the policy requirements or infrastructure are viable. The policy is also not considered to be inline with the NPPF which states that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment, and that the weight to be given to that assessment is for the decision maker. The HBF also consider that this policy could be quickly outdated, as the evidence that the Plan is based upon dates.

Whole Plan Viability

The Council only published a whole plan viability assessment for consultation part way through this consultation. Therefore, it has not possible to consider whether policy requirements and infrastructure provision required are viable, as the report is not able to make these conclusions at this point as the evidence is still subject to consultation. This lack of evidence is not considered acceptable as it fails to give the development industry sufficient opportunity to submit comments on the viability of a plan. It also suggests that the cumulative impact of the plan on the viability of development did not inform its preparation and the Council cannot say at this point whether or not the plan is deliverable. Paragraph 34 of the NPPF requires Council to consider the implications on viability of policies in the local plan, therefore the HBF consider the viability assessment to be a key supporting document that should have been published as part of this consultation.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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