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Dear Sir / Madam,

BRADFORD CORE STRATEGY PARTIAL REVIEW: SCOPING REPORT

Thank you for consulting with the Home Builders Federation on the Core Strategy Partial Review Scoping Report.

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 from 2030 to 2035. The HBF support the Council in extending the Plan period. However, given it is already 2019 and Table 4.1 suggests that the Plan won't be adopted until December 2021, the HBF would question if the period should be extended further 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 proposes to use the Government's standard method to establish the baseline minimum housing need figure, and to produce further updated local housing, demographic and economic evidence to assess whether there is any justification for an uplift to this baseline figure.

The HBF would support the Council in producing an updated evidence base in relation to housing, demography and the economy to determine if there is any need for an uplift to the baseline figure.

The Standard Methodology for the period 2016 to 2026 (based on the 2014 household projections) identifies an indicative housing need for Bradford of 1,663 dwellings. The figure generated by the standard method is considered as the minimum starting point, it is noted that it relies on past growth trends, which in the case of the Bradford may have been affected by poor housing delivery. As an example, over the 5-year period 2012-2017 only 5,555 homes have been delivered in Bradford compared to the Core Strategy housing requirement of 11,000.

The Council will be aware that MHCLG have undertaken a consultation in relation to changes to the parts of PPG relating to the standard method for assessing local housing need. The consultation highlighted that the Government's priorities continue to be to deliver more homes and to do so faster. But it also proposed that for the short-term, the 2014-based data will continue to provide the demographic baseline for assessment of local housing need. The HBF consider that the Council should consider the Standard Method the starting point for the housing requirement and should consider whether it appropriately reflects the affordable housing needs, households who may want to form new households and the economic growth of the area.

The Council proposes to update the current housing land supply and consider the extent to which it can meet the housing requirement. The HBF would support the Council in updating its housing land supply and would encourage the Council to work with the housing industry to ensure that this supply is both realistic and deliverable.

Policy HO3: Distribution of Housing Development

The Council propose to consider the areas of need within the Borough, the supply of land available and the levels of completions. They also propose to explore options to maximise brownfield site development options. The HBF consider that the efficient use of land including the re-use of previously developed land can perform an important role as part of a balanced portfolio of housing sites. Therefore, this policy direction is generally supported providing this is not interpreted as prioritisation of such sites. The Council should seek to build upon mechanisms such as the Brownfield Register to encourage the re-use of previously developed land alongside greenfield opportunities.

The Council also propose to look at the outputs from the Green Belt Review and consider whether there is a potential need to release areas of land. The HBF is generally in support of the Council considering the potential to release Green Belt land if it is needed. The NPPF paragraphs 136 and 137, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. The Council will need to ensure that these exceptional circumstances are fully explored in their Local Plan. Providing that the authority is able to demonstrate that it has fully examined all other reasonable options, the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations.

The Council propose to review the deliverability and viability of sites, this is supported and the HBF would strongly recommend engaging with the housebuilding industry to ensure this happens.

Policy HO4: Phasing the Release of Housing Sites

The Council intends to consider whether it is still appropriate to phase release of housing sites. The HBF would generally not support the artificial phasing of sites, unless there is sufficient evidence to justify this approach.

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

The Council intends to consider whether the targets set for development on PDL are still appropriate. The Core Strategy currently states that 50% of total new housing development over the Plan period will be on previously developed land. 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

The Council proposes to update this policy using evidence from the new SHMA. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, 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

The Council is proposing to look at the different optional standards that could be introduced including the NDSS, a proportion of M4(2) and M4(3) and a higher water efficiency standard.

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.

The nationally described space standards (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.

All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). PPG (ID: 56-010) states that where there is a clear local need, local planning authorities can set out policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. In order to introduce the policy the local planning authority must establish a clear need based on: existing sources of evidence; consultations with the local water and sewerage company, the Environment Agency and catchment partnerships; and consideration of the impact on viability and housing supply of such a requirement. The PPG goes on to suggest the types of evidence which might support a tighter water efficiency standard including the identification of areas of serious water stress, or a river basin management plan which highlights the pressure that the water environment faces.

Policy HO11: Affordable Housing

The HBF would support the Council in looking to meet an evidenced affordable housing need and in utilising up to date viability information to determine a viable affordable target across appropriate sub-areas of the Borough. 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.

Policy SC7: Green Belt

The HBF would support the Council's decision to identify any exceptional circumstances for the release of Green Belt land and would again 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

The HBF would support the Council in updating its viability evidence and would as previously stated 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.

Additional Policies

The following topics have been highlighted as possible new policy areas for further consideration:

- Specialist housing
- Self and Custom Build

- Combined infrastructure priorities
- Green Infrastructure – further details
- Healthy places

At this stage no detail is provided as to the content of these policies, however, the HBF would recommend that appropriate evidence is collated to ensure these policies are robust and sound.

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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